

# Code of Business Conduct

Experts in perimeter protection



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# Our values

## A Message from Emmanuel

At Heras, our values unite us in the way we work, every day, in all our countries. They are the foundation of our culture – they show what’s important to us beyond financial performance. If we really want to make the world a safer place want to grow sustainably and deliver value for society, for our customers, for our partners, for the world around us, we must do that with the same conviction, with respect for each other, for our laws and standards.

This Code of Business Conduct “the Code” describes the commitments we make as an organization and what we expect from our employees in their dealings with colleagues, customers, partners, suppliers and other stakeholders, and our company property. Economic success and integrity go hand in hand for us. By showing integrity in all our activities, we can contribute to the development of sustainable and honest society. However, this vision can only be realised if we all follow the same rules, show our commitment and be transparent, fair and at all times doing business with respect. We are committed to achieve that.

I would like to ask you – as an employee of Heras – to carefully read the Code and carry out all intentions. The Code is not intended as a basic reminder of what we stand for, but a guideline for every day. The policy contributes to a healthy corporate culture and to our values as a reliable, committed and expert partner. Should you ever have a genuine concern that this Code is being violated, you must speak up by reporting to management, HR or the Heras Hotline.

Emmanuel,  
CEO



### Reliable

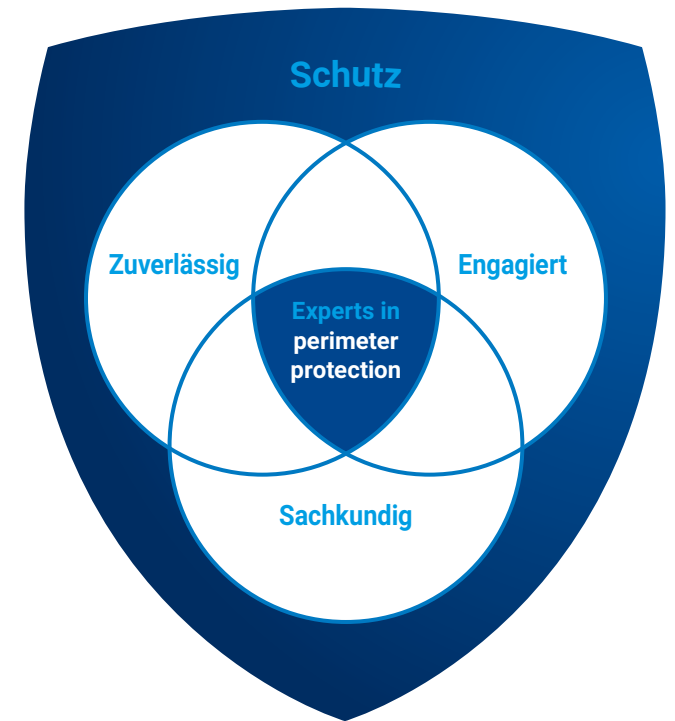
Reliable in creating a safe and secure environment, by providing effective perimeter protection, which lives and livelihoods depend on.

### Committed

Committed to the health and safety of our customers, employees and wider communities. We value diversity and treat all people with equal respect. We always act with integrity and honesty. Working together with our value chain creating a circular economy and lower our environmental impact.

### Expert

Experts in perimeter protection. Designing smart and sustainable solutions with innovative products. Actively working to reduce our impact on the planet. Listening to our customers to protect what they value most. Facing challenges whilst striving to reach the highest standards.



# It begins with me

Our company culture is built by the day-to-day actions of you, our employees. This Code of Business Conduct (“the Code”) is your practical guide to upholding Heras’ values and acting ethically in our workplace, in our business practices and in our communities. Since the Code does not address all possible situations you might face in your work, you are expected to use good judgment and common sense, ask for guidance when uncertain, and speak up when something isn’t right.

Everyone who works for Heras has a duty to read, understand, and abide by this Code. The Code applies equally to everyone, from temporary and part-time employees to our most senior management. Our management-controlled joint ventures also agree to abide by the Code.

No one is ever authorised to violate the Code. Anyone doing so is acting solely on his/her own behalf, contrary to Heras’ best interests, and is subject to appropriate discipline.

Additionally, if you are in a management position, you have a responsibility to:

- Ensure each person on your team has read and understands the Code
- Lead with integrity: Model the good conduct you want to see in your team
- Foster an open-door culture where your team feels comfortable asking questions and raising concerns about conduct issues
- Embrace all initiatives and training that support the Code

# Making the right decisions

At times you may be faced with a situation where the right thing to do isn’t obvious. To assist you in making the right decision, ask yourself these questions:



**Is it legal?**



**Is it consistent with our values, ethics, and culture?**



**Would I be comfortable telling my family and friends about it?**



**No to any**

Stop, don’t do it



**Unsure**

Get advice - speak to your manager or contact your HR department



**Yes to all**

Move forward

# It begins with me

If you have a genuine concern about a possible breach of the Code, you must speak up about it. There are five ways you can report your concerns. Throughout this Code, "REPORT" means to inform any of the following:



# When contact the hotline

<p> <b>Can I report anonymously?</b></p> <p>Yes. The Hotline is managed by an external third party and you do not have to provide your name.</p>	<p> <b>Who investigates my report?</b></p> <p>Your report will be sent to and assigned to an appropriate person to investigate. Each report is taken seriously and fully investigated.</p>	<p> <b>I want to report a concern but I'm afraid I will be retaliated against.</b></p> <p>Does not tolerate retaliation for reporting a genuine concern. Your report will be handled discreetly and in a confidential manner, to the extent reasonably possible and allowed by local laws.</p>
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Hotline: external partner: BMW: [contact@bmwe.info](mailto:contact@bmwe.info)

# The hotline

The Hotline allows employees, customers, suppliers and other stakeholders to report genuine concerns relevant to the Code, inappropriate or illegal behaviour, or violations of policies or local laws. Retaliation for reporting genuine concerns is not tolerated at. Please note that routine employee issues are best dealt with by your local HR team.

If I see or hear something unsafe, unethical, or illegal, I speak up!



# Conduct in our workplace

- Putting Safety First
- Respecting Others
- Protecting Company Assets and Data
- Maintaining Confidentiality and Avoiding Insider Trading
- Use of IT Systems and Social Media
- Keeping Accurate Records

# Putting Safety First

Safety is the condition of being protected from or unlikely to cause danger, risk, or injury.

## At Heras

We always put safety first. We must ensure a healthy and safe environment for all employees, contractors, customers and visitors at our construction sites .

### It begins with me

- Work in a safe manner at all times
- If you see something unsafe, stop and do something about it
- Follow all local policies on drugs and alcohol in the workplace
- Comply with local safety requirements, as well as the Health & Safety
- Live by the Life Saving Rules

### What if

<p>I'm a maintenance manager and I have serious concerns about a piece of equipment. I tell my supervisor, but he says that we don't have the budget to fix the equipment this quarter and we need it in operation so we can meet our production targets. What should I do?</p>	<p>If possible, guard off the equipment and REPORT the situation.</p>
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If I see something unsafe, I will stop and do something!

# Respecting others

Respect means treating everyone in your workplace the way you want to be treated.

## At Heras

We provide equal, merit-based opportunities to all our employees, valuing their diversity, promoting inclusion and rewarding them fairly.

We do not tolerate discrimination, bullying, harassment, or any other behaviour that is not reflective of our values.

### It begins with me

- Treat everyone in your workplace with dignity and respect
- Value diversity and the contributions of others
- Do your part to create a culture of respect and be actively inclusive in your work environment

### What if

<p>My co-worker removes a machine safety guard while it is still in operation to inspect an issue.</p>	<p>Safety guards should never be removed while a machine is still operating, as you risk serious injury to yourself and others. If you observe a co-worker removing a safety guard without following proper safety procedures, stop them from proceeding.</p>
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# Protecting Company Assets and Data










A company's assets are essential to its operations. Its people, shareholders and customers, all rely on the security of company assets and data.

## At Heras

Our assets take many forms, some of which are shown below. No matter the form, all assets and resources are valuable to our business and must be protected. We all have a responsibility to use our assets and resources in a proper manner and for their assigned purpose.

### It begins with me

- Safeguard all forms of Heras assets, including from theft and damage
- Special care should be taken when handling the personal data of employees or customers, ensuring that it is secure and encrypted
- Read the Data Security policy

 <p><b>Stocks of raw materials, supplies, real property, equipment and vehicles</b></p>	 <p><b>Funds (cash and investments)</b></p>	 <p><b>Time</b></p>
 <p><b>Intellectual property</b></p>	 <p><b>Accounting and other business records</b></p>	 <p><b>Confidential information</b></p>
 <p><b>Computer hardware and software</b></p>	 <p><b>Electronic mail and internet access</b></p>	 <p><b>Personal data</b></p>

### What if

<p>I notice that inventory is missing after the weekend. Only one other employee and I have access to alarm codes and door keys.</p>	<p>You should REPORT your suspicion of theft.</p>
<p>I see a colleague plugging in external storage devices to his laptop and saving files to them. This colleague has recently handed in his notice.</p>	<p>As an employee of Heras, you have a duty to REPORT any suspicious activity. Contact lists, files, etc. are all property of Heras.</p>
<p>I accidentally share a file containing employees' personal data with a third party.</p>	<p>You should REPORT the inadvertent disclosure before taking any action.</p>
<p>I work in accounts payable, and I receive an email from the CFO asking for a wire transfer to be made immediately to a vendor that I've never heard of.</p>	<p>Do not process the payment until you have called the CFO to confirm that he/she sent this request. If he/she did not send the request, REPORT the fraudulent email.</p>

I will take care of company property and will not steal or misuse anything.



# Using IT Systems and Social Media

IT systems are vital for running a business. IT systems include internet access, email, company-issued mobile devices, and licensed software. Social media platforms are an opportunity to share targeted information with a global audience.

## At Heras

IT systems should never be used to do anything illegal or unethical, including distributing, downloading or viewing unlawful, offensive, or otherwise inappropriate materials. Communication with the public is only authorised through official channels including: press releases, formal company publications, media briefings, our corporate website or local websites and our official social media channels.

## It begins with me

- Use all IT systems responsibly and lawfully
- Only use company-owned devices to store company information, unless you have explicit approval from local management to use your own device
- Do not use social media to:
  - Share confidential information,
  - Violate the Code,
  - Engage in harassment, discrimination, or retaliation, or
  - Violate any other laws or ethical standards
- Remember that if your social media activity would violate any of Heras' policies in another forum, it will also violate them in an online forum

## What if

<p>I recently worked on the development of a new product. The product launch is not for another three months. I'm proud of my work, and I want to post some details about the new product on my personal Twitter account.</p>	<p>Since Heras has not officially announced the new product, the product details are confidential and therefore should not be shared publicly.</p>
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# Keeping Accurate Records

It is important to keep accurate and complete business records and to ensure timely and accurate reporting of financial and non-financial information as required by local laws. Any attempt to hide, falsify, or misrepresent information in order to mislead others is fraud.

## At Heras

We promote integrity throughout the organisation and meet our responsibilities to stakeholders. Heras does not tolerate any form of fraud and requires all its employees to demonstrate a high standard of honesty and integrity in their work.

### It begins with me

- Ensure all business records are complete and accurate
- Never submit false or misleading information to a customer or government authority
- Read the Anti-fraud and anti-theft policy
- REPORT any actual, suspected, or attempted frauds

I will hold myself to the highest standards of honesty and integrity in my work.

## What if

<p>A customer’s contract requires a particular material be used on a project. To save time, can I substitute a similar material that is more readily available without telling the customer?</p>	<p>No, that would be fraud. You must use the material specified in the contract or obtain the customer’s approval to use a different material that still meets the project specifications.</p>
<p>The sales numbers in my country/region been unusually low this quarter. I’m expecting a major sale to go through early next quarter, so I want to go ahead and record it now so that I will meet my quarterly sales goal.</p>	<p>Purposely creating an inaccurate financial record is fraud. Your sales must be recorded in the quarter in which the transaction takes place.</p>
<p>After a monthly inventory count, there is a large difference between the actual stock on site versus what is in the system. My colleague suggests that I simply change the numbers in the system to match what’s on site and not inform anyone.</p>	<p>Do not alter the accounting system to hide the missing inventory. Tell your manager about the discrepancy.</p>
<p>I am performing quality control tests for a public authority project. I receive test results that are below standard, but I know that reporting this could cause a delay in the project. Should I consider manually adjusting the results in my report to the transportation authority to avoid a delay?</p>	<p>Do not adjust the test results. By doing so you would be submitting a falsified report to a government authority. This can result in serious consequences for you and Heras.</p>



# Conduct in our business practices

- Competing Fairly
- Refusing Bribery and Corruption
- Considering Gifts and Hospitality
- Avoiding Conflicts of Interest
- Complying with International Trade Laws
- Preventing Money Laundering
- Third Party Relationships

# Competing Fairly

Competing fairly is important because it results in a free and open market. In a free market system, competition drives efficiency and innovation, and companies compete on a level playing field. Violations of laws that protect competition can lead to penalties that include large fines, jail time, damaged reputation and exclusion from government contracts.

## At Heras

Fair competition is in everyone's best interest. We are committed to complying with competition/antitrust laws wherever we operate.

### It begins with me

- When interacting with competitors always refer to the Do & Don't guidance
- Seek guidance from senior management, whenever a competition/antitrust law question arises
- Read the Competition and anti-trust Policy



- Compete vigorously, using public information and competitive circumstances to your best advantage
- Remember that compliance is always in Heras best interest. No one is ever authorised to violate the law
- Remember that appearances are important
- Ask your manager if you have any doubts. On competition matters, there are no stupid questions



- Discuss with a competitor any terms on which you compete, prices, or allocations of jobs, customers, or markets
- Discuss with a competitor whether or not you intend to submit a bid or quote for any particular project or customer
- Talk to anyone about boycotting or refusing to deal with a supplier or customer
- Take any action just to hurt or retaliate against a competitor









## What if

<p>I want to analyse trends in my local market. What sources can I use to gather information about my competitors?</p>	<p>Publicly available sources such as trading results, trade journals, and websites can be used, but do not obtain information directly or indirectly from a competitor or discuss what you find out with a competitor. Always record where you obtained information about a competitor.</p>
<p>A competitor sent me a text message suggesting we are not making enough money in a certain region and we should get together to agree minimum prices to charge customers in that region.</p>	<p>Contact your manager and get advice on how to respond. Clearly refusing to participate is important because silence can be seen as agreement.</p>
<p>Heras and two other competitors (companies B and C) were invited to submit a tender. A representative from company B approached me and suggested that I submit lower bid and guarantee Company B a position as a subcontractor. Neither Heras nor company B was awarded the contract. Did I engage in anti-competitive behaviour?</p>	<p>Yes, the fact that you and company B were unsuccessful in the tender process does not change the fact that your actions were anti-competitive.</p>

I will enhance our competitive advantage by complying with the law.

# Refusing bribery and corruption

A bribe is anything of value that is offered, given, or received, with the intention of influencing the actions of a person or company. There are strict laws against any form of bribery, particularly bribery of public officials. People who work for any level of government are public officials. For example, local council members, safety inspectors and law enforcement officers are all public officials.

 <b>Money</b>	 <b>Gifts</b>	 <b>Hospitality, including travel expenses</b>
 <b>Business or employment opportunities</b>	 <b>Political contributions</b>	 <b>Charitable or community donations</b>
 <b>Other favours or benefits</b>	 <b>Facilitation payments</b>	

Corruption is the abuse of power for personal gain. Examples of corruption include embezzlement and kickbacks.

## At Heras

Heras is committed to abiding by all applicable anti-bribery laws. We do not tolerate any form of bribery or corruption.

## It begins with me

- Never offer, pay, solicit, or accept bribes
- Always avoid situations that could give the appearance of bribery or corruption
- Be aware when dealing with government officials and regulators. Follow any local rules related to offering things of value to government officials.
- Read the Antibribery and anti-corruption policy



# Considering Gifts and Hospitality

Giving and receiving gifts and hospitality can be an acceptable way of building business relationships if ethical guidelines are followed.

## At Heras

We believe that business gifts and hospitality can be given and received if they are reasonable, justifiable, and proportionate. Otherwise this may be bribery or look like bribery.

## It begins with me

- Determine if your department or local operating company has issued gifts and hospitality guidelines
- Before offering or accepting gifts and hospitality, ask is it:

During a tender or contract review period or other time sensitive issue?

Potentially embarrassing if it was made public?

Possible it could be seen as inappropriate influence?



Excessive or disproportionate in nature?

Linked to doing something or agreeing not to do something?

Likely to make me feel uncomfortable if I had to tell a senior manager about it?

Yes to any question? Do not proceed. Contact senior management for advice.

Heras Code of Business Conduct



**What if**

<p>I am working on a project with materials being imported from overseas. The import clearance has been delayed. If I give the customs official a small payment directly, he will clear the materials immediately. I have already paid the official fee for the import clearance. Should I pay the official?</p>	<p>No, this would be a facilitation payment prohibited by Heras policy and could be illegal.</p>
<p>A representative of a potential supplier tells me that if we award them the contract I'll be eligible for a cash payment under their "corporate customer reward programme." How should I respond?</p>	<p>The supplier has offered you a cash gift that is linked to a positive business decision, so this could be seen as a bribe. You should tell the commercial representative that you cannot participate in the reward programme and REPORT the offer.</p>

**What if**

<p>A public official, the Director of Public Works, stops by my plant one day with a question on a change order I submitted. While there, he mentions that his truck could use some new brake pads. He is curious to see if our mechanic could replace them. I have the right brake pads in my shop so our mechanic replaces them free of charge. The Director grants the change order the next day. Is there a problem?</p>	<p>Yes. While the brake pads did not cost much to replace, the timing makes it look like it was done to influence the Director's decision about the change order, and this could be seen as bribery.</p>
<p>I recently met with an official from a public university to discuss supplying materials for a student housing project. The official told me that she will make sure we get the contract if we donate to the university's scholarship fund. Should we make the donation?</p>	<p>No, making a donation in exchange for an award of a contract is bribery. Tell the official that you cannot make a donation that is tied to a contract decision and REPORT the conversation.</p>

# Avoiding conflicts of interest

A conflict of interest occurs when an employee's personal interests interfere with his/her ability to act in the best interests of the company.

## At Heras

A conflict of interest that influences your business judgment is a violation of the Code. Having a potential conflict of interest is not automatically a violation of the Code, but failure to disclose it is.

## It begins with me

- Disclose all potential conflicts of interest you may have
- If you have questions on the disclosure process, contact senior management
- Do not act as the decision maker where there is a conflict
- REPORT any situation that you believe may be a conflict of interest

## Is it a conflict? Ask yourself:

<p>Could my personal interests or relationships influence the decisions I make?</p>	<p>Could it look that way to someone else?</p>	<p>If yes, it is a conflict. Seek guidance when you are not sure.</p>
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I will avoid conflicts between my private interests and my job. If there is a potential conflict, I will disclose it.

## What if

<p>I'm an engineer in our business. In my own time I develop components that improve our gates. I'll purchase 100 of these for use in Heras.</p>	<p>Because you are both the supplier of the component part and the purchaser, this is a clear conflict of interest. You should disclose it to your manager and not be involved in the decision to purchase.</p>
<p>I work in IT. My son-in-law owns a technology company that offers a solution that would help our data security efforts. I ask my son-in-law for a quote. I don't get any other quotes. Is there a conflict?</p>	<p>A conflict exists. Additional quotes should be sought from other third parties, and you should not be involved in the decision to purchase. You should also disclose the conflict to your manager.</p>
<p>I oversee the sales department for my company. My sister is the President of the largest competitor in my area.</p>	<p>This is a potential conflict and should be disclosed.</p>



# Complying with international trade laws

International trade laws and regulations, which are put in place by the United States, European Union and other governments, include export control laws, trade sanction laws (restricting trade with certain countries or individuals), import laws and anti-boycott laws.

## At Heras

We are committed to complying with international trade laws that are applicable to our businesses. Violations of these laws can negatively impact our reputation and could result in penalties.

### It begins with me

- Employees involved in international procurement or sales should be aware of relevant trade laws, who our customers and suppliers are, the end-use and ultimate destination of our products, and how payments are made
- Report any actual or suspected breaches of international trade laws to your manager

# Preventing money laundering

Money laundering is using otherwise lawful business transactions as a way to hide the source of money that has been obtained illegally. It is “cleaning” funds obtained from criminal activities. Money laundering typically involves payments in the form of cash or money order. Suspicious activity includes: large cash transactions as well as customers who are reluctant to provide verifiable information.

## At Heras

We are committed to complying with applicable anti-money laundering and counter terrorist financing laws and regulations. We do not condone, facilitate, or support money laundering or terrorist financing.

### It begins with me

- Watch out for irregularities in the way payments are made
- If you have concerns about a payment, request an alternative form be used and report the concern to your manager
- If the transaction seems suspicious, report it to Group management Team, even if you do not move forward with the transaction
- Determine if your business has specific preventative measures in place

# Third Party Relationships

Suppliers, both direct and indirect, are key stakeholders in the success of any business. Working with responsible suppliers is an important part of Corporate Social Responsibility.

## At Heras

We only choose suppliers who share our commitment to ethical business practices and who meet our standards in respect of health & safety, human rights, and environmental stewardship.

### It begins with me

- Ensure suppliers meet the requirements of our Supplier Code of Conduct
- Read the Supplier Code of Conduct



## Conduct in our community

- Respecting Human and Labour Rights
- Promoting Environmental Sustainability
- Engaging With and Supporting the Community
- No political involvement on the company's behalf

# Respecting human and labour rights

There is opportunity to protect human rights and labour rights everywhere along a company's supply chain and in its production and sales activities.

## At Heras

We are committed to respecting human and labour rights, no matter where we operate in the world. We support the principles outlined in the UN's Universal Declaration of Human Rights and the International Labour Organisation's Fundamental Labour Principles. Furthermore, we commit to adopt programs to address industry-specific human rights exposure, apply human rights due diligence or conduct risk assessments (Supplier Code of Conduct), communicate this policy to personnel and external stakeholders, monitor and report on human right impacts (Sustainability report) and provide remedy to correct negative impacts.

### It begins with me

- Do your part to ensure that human rights abuses, such as the use of compulsory, forced, or child labour, are not occurring within our businesses or supply chains
- Support freedom of association and recognise the right to collective bargaining with recognised trade unions.
- Ensure we deal responsibly with our suppliers and customers
- Read the Anti-slavery and human trafficking policy and the Social Policy

I will respect human rights and comply with labour laws.

# Promoting environmental sustainability

Working to meet high environmental standards, actively addressing climate change and continuously improving processes all promote environmental sustainability.

## At Heras

Our Environmental Policy demonstrates our commitment to implementing best practices concerning environmental issues and outlines improvements we are making across our organisation. It covers environmental compliance, communications, climate change, emission reduction, resource use, recycling, biodiversity, sustainable innovation, and good stakeholder relationships.

### It begins with me

- Comply with environmental laws and regulations applicable to your work
- Participate in relevant training programmes
- REPORT any concerns of non-compliance with environmental laws or regulations
- Read the Environmental Policy

I will think about the environment I would like to live in and play my part to protect it.

# Engaging with and supporting the community

Being a responsible company means developing trusting relationships and creating a long-term positive impact in the communities in which we operate.

## At Heras

We take our community engagement responsibility seriously. All community engagement and interaction is respectful and appropriate. We encourage employees and businesses to develop local interests and involvements which support the development of a thriving community and a better overall living environment.

### It begins with me

- Be a good neighbour in your local community. Find ways to make a positive impact, while following local company guidelines on community engagement
- Where possible, develop a community engagement plan for your location

### What if

<p>A customer asks me to donate to a local school fundraiser for a new roof. She is collecting cash donations. Can I make a donation on behalf of Heras?</p>	<p>Cash donations and donations to individuals are strictly prohibited. All charitable donations should be approved by management and made in the form of a company cheque or by electronic transfer to the receiving organisation.</p>
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I will be a good neighbour in my local community.

# No political involvement on the company's behalf

Political involvement includes any active political role or influence on the company's behalf. It also includes political contributions such as donations to support a candidate, party, or political cause. Or in-kind contributions like the use of company facilities, resources, or employees' time to further a political campaign.

## At Heras

We prohibit political involvement of any kind on the company's behalf.

### It begins with me

- Before making a company contribution that has the appearance of political involvement, always contact Finance to confirm that it is not.





# Quick reference tools

- Guide for Reporting Concerns
- Code of Business Conduct: It Begins with Me Guide

# Guide for reporting concerns

Remember, if you have a genuine concern about a possible breach of the Code or the law, speak up. Please report your concern to any of the contact persons mentioned below. Heras commits to investigate business conducts incidents promptly, independently and objectively.

 <b>Your line manager</b>	 <b>Senior management</b>	 <b>Heras hotline (BMW)</b>	 <b>Your HR Manager</b>
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# Our code of business conduct: It begins with me



## Putting Safety First

If I see something unsafe I will stop and do something.



## Avoiding conflicts of interest

I will avoid conflicts between my private interests and my job. If there is a potential conflict I will disclose it.



## Respecting others

I will treat everyone in my workplace the way I want to be treated.



## Supporting the community

I will be a good neighbour in my local community.



## Protecting company assets and data

I will take care of company property and will not steal or misuse anything.



## Respecting the environment

I will think about the environment I would like to live in and play my part to protect it.



## Respecting the law

I will not break any laws. I will hold myself to the highest standards of honesty and integrity in my work.

Concerned? Speak up! Call Heras hotline

Published by	Heras
Contact Person	Country HR Manager
Purpose	Ensure transparent and compliant business conduct
Application / Distributed to	All employees
Classification	Public
Monitoring	Executive committee
Version	V_1.2
Signed off by / on	Board Heras

