




Code of Business Ethics (COBE) Policy
Making the right choices- doing the right thing

Working at Height Limited – Integrated Management System Manual		Version: 1 Date: 01/06/2021	Doc No: 4.1.0
Code of Business Ethics Policy (COBE)	Author & Approval: Adrian Mc Mahon	Document Status: Current	No of Page's: 32

Director Message

At ® Working at Height Limited™, we know what we do, and more importantly, how we do it, matters. We know our daily decisions and activities make a difference and impact all our stakeholders. We constantly strive to ensure our; stakeholders, such as customers, suppliers, investors, lenders, regulators, Indigenous groups, neighbors and employees trust us, and feel confident they can count on us to make the right choices and to do the right thing.

Our corporate values - safety, responsibility, collaboration and integrity - form the foundation of how we do business. Code of Business Ethics (COBE) helps us put those values into practice by clarifying what making the right choices and doing the right thing look like in action.

Every member of the Working at Height Limited team is expected to read and understand the principles set out in COBE and is required to complete annual COBE training and certification. We encourage our teams to refer regularly to COBE to help guide ethical situations they may face at work, as it clarifies the behaviour expected.


We know it takes all of us living our values every day to ensure Working at Height Limited continues to be a company our stakeholders and the public can count on.

We're committed to making the right choices and doing the right thing, while fostering an environment where we respectfully keep each other accountable.

Adrian McMahan.

Founder & CEO Working at Height Limited

01/06/2021

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Our expectations and Your Responsibilities

The Code of business Ethics (COBE) policy reinforces Working at Height Limited's Incorporations (The Company's) requirements and expectations for conducting business and behaviors and provides guidance to ensure our daily activities and decisions appropriately reflect, and are consistent with, our corporate values of Safety, Responsibility, collaboration and integrity. Doing business ethically, fairly and responsibly is not just a concept at Working at Height Limited, it is a commitment we make every day.

The COBE Policy functions in conjunction with Working at Height Limited other policies and applies to all Employees, directors, officers and Contingent Workforce Contractors (CWCs) of Working at Height Limited and its wholly-owned subsidiaries and operated entities in all countries in which Working at Height Limited conducts business.

You must understand these requirements and know how to meet Working at Height Limited standards. We expect compliance with all applicable laws, regulations, policies and rules.

If you are unsure of what standard you need to comply with, ask. Contact information is located in the Resources section of this document.

Failure to comply with the requirements set out in this document, or any Working at Height Limited policy, may lead to serious consequences and disciplinary action up to and including termination.

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Our Corporate Values

Safety

We believe Zero is Real. All injuries and occupational illnesses are preventable. Our Personnel are expected to speak up about unsafe conditions and behavior's, take action to address concerns or stop unsafe work, and look out for each other 24/7.

Integrity

We act with high ethical standards, treat others with honesty and respect, and keep promises and commitments to stakeholders

Collaboration

We engage others, participate in healthy debate and respect different perspectives. We work together to find better ways to solve problems and create value. We find win-win outcomes for our shareholders and our customers.

Responsibility

We care for the environment and minimize our impact. We make a positive difference in our communities and consider sustainability in everything we do. We deliver for our customers and take personal accountability for results.

Living our values


- Making the right choices and doing the right thing
- Reporting safety, legal and ethical violations
- Leader responsibilities
- Zero is Real: Protecting health, Safety and the Environment
- Life Saving Rules
- Alcohol and drug use
- Diversity and employment equity
- Harassment and violence-free workplace
- Protecting everyone from weapons in the workplace

Our Training Values

P.R.I.D.E

Professional
Responsibility
In
Delivering
Excellence

PRIDE in your work is an old but true saying, we at working at Height Group wanted to honor the old saying and bring it to the 21st century. As a professional training organization, we assure our clients/delegates we bare full responsibility in following up to date industry best practice's and train our staff to be responsible in delivering excellence to our clients/delegates utilizing up to date industry best practice's. Working at Height Group embedded the PRIDE acronym in all training documents as our commitment to excellence.

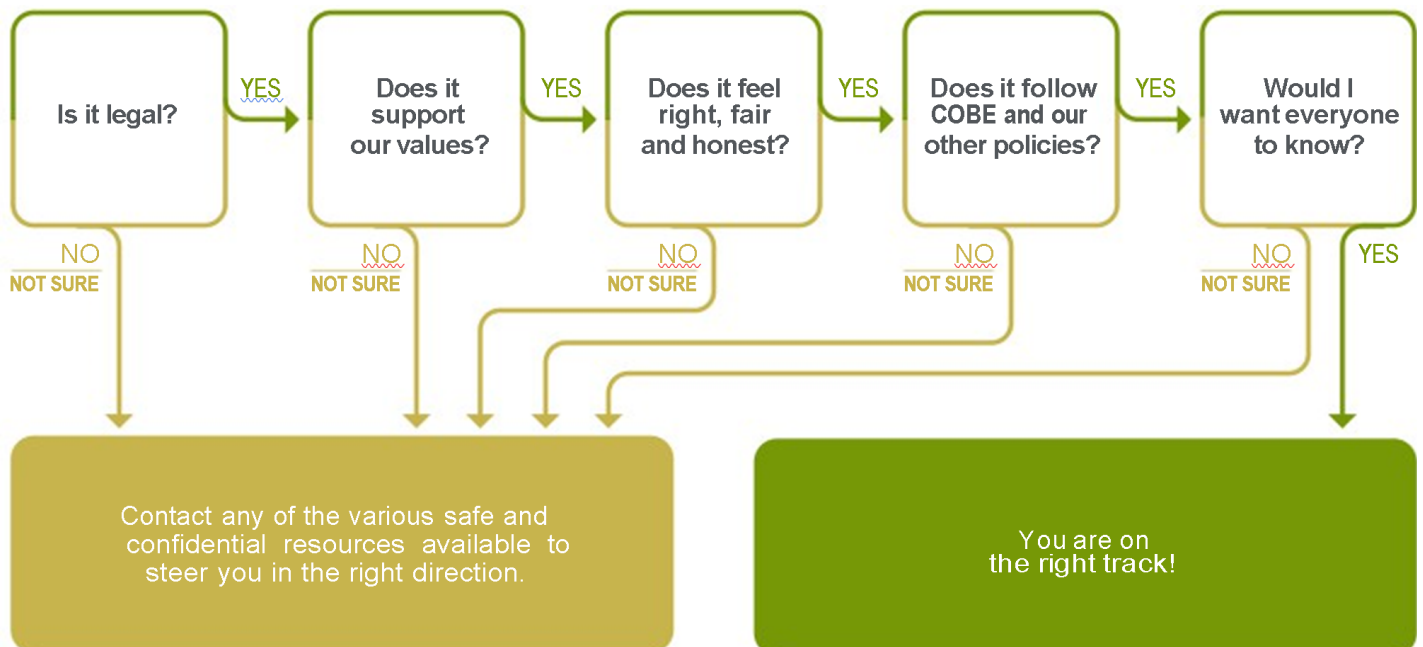
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Making the right choices and doing the right thing

At Working at Height Limited, making the right choices and doing the right thing aren't just words - these are fundamental requirements that all Personnel must carry out in everything we do. It's fundamental to how we do business. But, what does it really mean to make the right choices and do the right thing? At a minimum, it means following the principles set out in COBE, including:

- ✓ We report all health, safety and environment related hazards, potential hazards, incidents, near hits and unsafe acts
- ✓ We comply with the applicable legal requirements and policies that impact us in our daily work
- ✓ We report, through appropriate internal channels or the Ethics Help Line, any instances of actual or potential non-compliance with legal requirements or with our policies that we become aware of
- ✓ We do not retaliate against anyone for the good-faith reporting of an incident or issue
- ✓ We support others in making the right choices and doing the right thing

Even if we try our best to make the right choices and do the right thing, there are times when the right thing isn't completely clear. It's at those times that we need to ask ourselves some fundamental questions. The below guide to making the right choices and doing the right thing is intended to help you identify the right path in those situations.



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Reporting safety, legal and ethical violations

We report actual or potential non-compliances with our policies or our legal requirements, so they can be addressed appropriately. Retaliation for Good Faith Reporting is prohibited at Working at Height Group and you can be assured that your confidentiality and identity will be protected to the greatest extent possible

How do I report an issue or seek guidance?

You are required to report any actual or suspected violation of the law or COBE and all health, safety and environment related hazards, potential hazards, incidents, near hits and unsafe acts which you may become aware. We take every report seriously and provide immunity from disciplinary action for Good Faith Reporting of incidents and issues.

Resources

To report an issue, or if you would like guidance on how to make the right choices and do the right thing in a particular situation, the following resources are available to you:

- Your leader
- Your Human Resources Consultant
- Your Compliance Coordinator
- Corporate Compliance
- Internal Audit Incident
- Law department
- Privacy Office
- Harassment Investigation Coordinator
- Safety Personnel
- WAHG Environment Health and Safety Management (EHSM)
- Management System

If you are uncomfortable speaking to any of these resources or if you would like to remain anonymous, you can contact the Ethics Help Line.

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Leader responsibilities

Working at Height Limited leaders are here to help us make the right choices and do the right thing together.

If you are a leader, in addition to acting in accordance to the principles set out in COBE, you are required to:

- 👉 Inspire Personnel to act ethically by setting an ethical tone within your team.
- 👉 Reinforce the importance of making the right choices and doing the right thing when carrying out other corporate objectives (for example profits and cost management) and support those who are unsure how to make the right choices and do the right thing.
- 👉 Set an example by modeling exemplary ethical business conduct.

Create a safe environment where individuals are encouraged to speak up if they become aware of or suspect a legal or ethical violation.

- 👉 Ensure that your team members understand and act in accordance with all legal and ethical requirements that impact them in their jobs, that they know how to report actual or potential non-compliance with the law or COBE or to ask questions regarding ethical or legal matters, and that they complete all required ethics and compliance-related training.

Understand your obligation to act on any actual or suspected violations of COBE, any of our other policies, or the law that may be reported to you and the requirement for you to report these issues, as appropriate, to your Compliance Coordinator, Corporate Compliance, Internal Audit, the Harassment Investigation Coordinator, Privacy Office or the Ethics Help Line


- 👉 Engage with Human Resources, your Compliance Coordinator, Corporate Compliance or Internal Audit to ensure violations of legal requirements or COBE by your direct reports are addressed appropriately (including appropriate corrective disciplinary action)

Zero is Real

Protecting health, safety and the environment

Our commitment to safety isn't just words - it's a belief and a requirement that underpins everything our Personnel do. It's how we work 24/7, 365 days of the year across our entire organization.

We expect that our Personnel share Working at Height Limited's commitment to safety.

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Whether you work in a field location or in an office setting, you must ensure that you always comply with all health, safety and environment related legal requirements, as well as the requirements set out by Working at Height Limited's in COBE and Applicable policies.

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If it isn't safe, we won't do it. By reinforcing a disciplined sets of rules and providing rigorous training and annual instructor workshops. We Approach every day with our goal of a zero-incident workplace and leave no trace in the environment.

Working at Height Limiteds **Life Saving rules** guide the way we work and help us hold each other accountable to the highest possible safety standards.

Working at Height Limiteds Life Saving Rules are:

-  Drive safely and without distraction.
-  Use the appropriate personal protective equipment (PPE).
-  Use the appropriate personal fall protection equipment (PFPE).
-  Conduct a pre-job safety analysis (JSA).
-  Work with a valid work permit when required
-  Obtain authorization before entering a confined space.
-  Verify isolation before work begins.
-  Protect ourselves against a fall when working at heights.
-  Follow prescribed lift plans and techniques.


We report all health, safety and environment related hazards, potential hazards, incidents, near hits and unsafe acts. We take every report seriously, investigate to identify facts and ensure immunity from disciplinary action for the Good Faith Reporting of all incidents and issues.

QUESTION: *I'm working on a big project and it's very important to the Company that it be completed on-time and on-budget. I'm concerned that I might be injured if I rush my work, but I'm feeling a lot of pressure to do so. What should I do?*

ANSWER: *You should never compromise your or anyone else's safety. If someone is pressuring you to do so, you should report the issue.*

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Committing to our Life Saving Rules means meeting our goal of everyone going home safe from our offices, facilities and project sites, every day. Nothing is more important.

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Alcohol and drug use and being fit for work

We do not compromise our ability to do our jobs or the safety of others through the use of intoxicants, including drugs, alcohol or medications, whether they are legal or not.

Given the nature of Working at Height Limited's business, it is essential that all Personnel be fit to perform their jobs. The use of drugs or alcohol can impair your judgment and productivity and can lead to serious accidents and health and safety concerns - not only for yourself, but also for your coworkers and the public.

4.1.7 Alcohol and Drug Policy

Working at Height Group takes a zero-tolerance approach toward the use of alcohol, drugs and intoxication while working. You must always be fit for work while engaged in any Working at height Group's business. Inability to do so will result in serious consequences including being removed from our site(s) and corrective disciplinary action up to and including termination.

What does being fit for work mean?

Fit for work means being able to safely and acceptably perform your assigned duties without any limitations due to the use or after-effects of any intoxicants. This can include legally- obtained medications (prescription and over the counter) which has the potential to change or adversely affect the way a person thinks, feels, or acts.

Diversity, employment equity and equal opportunity

Working at Height Limited believes that our differences make us stronger and encourages a culture of diversity, inclusion and respect. We prohibit any form of discrimination and require reasonable accommodation of differences.


4.1.1 Equal Employment Opportunity

4.1.2 Harassment-Free Workplace

4.1.3 Reasonable Workplace Accommodation Policy

While acting on behalf of Working at height Group, you must never discriminate against anyone on the basis of:

- Gender
- Race
- National or ethnic origin
- Colour
- Disability
- Religion
- Age
- Sexual orientation and gender identity
- Marital status
- Family status
- Veteran status
- National Guard or reserve unit obligations
- A criminal conviction
- Or any other legally protected grounds

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+ Committing to our Life Saving Rules means meeting our goal of everyone going home safe from our offices, facilities and project sites, every day. Nothing is more important.


Everyone deserves to do their job in a safe, respectful, and inclusive workplace, without fear of harassment or violence. You must always be respectful to our Personnel and Contractors and be sensitive to the way in which others may react to your behaviour, comments, gestures or contacts. Always try to resolve differences in a calm and respectful manner, without resorting to insults, threats or violence. Working at Height Limited prohibits any behaviour, including displaying any statements, Messages, or images (e.g. on clothing, stickers on hardhats, decals on vehicles, etc.) that is;

- Intimidating
- Hostile
- Offensive
- Threatening
- Violent
- Demeaning or humiliating
- Of a sexual nature
- Creating an inappropriate work environment.

Working at Height Limited will take allegations of harassment and violence seriously and address them promptly in a respectful, fair and thorough manner by trained investigators. If required, Working at Height Limited will take appropriate corrective action, up to and including termination of employment or contract.

In particular, you should never take actions or make unwanted comments or gestures that relate to:

- Gender
- Race
- National or ethnic origin
- Colour
- Disability
- Religion
- Age
- Sexual orientation and gender identity
- Marital status
- Family status
- Veteran status
- National Guard or reserve unit obligations
- A criminal conviction
- Or any other legally protected grounds

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Protecting everyone from weapons in the workplace

Unless otherwise prohibited by law, we prohibit the possession, use, carrying, or transportation of any dangerous or potentially dangerous weapons, as defined by Working at Height Limited's Weapons in the Workplace Policy, when conducting Company business:

- on or off all Company owned or controlled premises;
- in all Company vehicles (whether owned, leased or rented); and
- in all personal vehicles being used while conducting Company business.

For individuals in jurisdictions that permit firearms to be kept in personal vehicles, the vehicle must be locked, firearms must be hidden from plain view and be kept within a locked case or container within the vehicle.

4.1.53 Weapons Free in the Workplace Policy

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Individuals who are licensed to lawfully carry firearms (openly or in a concealed manner) are not exempt from our Policy, unless otherwise prohibited by law.

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Ethical Business Conduct

- Avoiding Conflicts of interest
- Personal Relationships
- Gifts and entertainment
- Engaging government officials
- Political contributions and lobbying
- International trade
- Insider trading
- Complying with regulatory requirements
- Inter-affiliate interactions
- Competing fairly
- Accounting, Financial reporting and fraud prevention
- Preventing money laundering and terrorist financing

Avoiding conflicts of interest

We must act in the best interests of Working at Height Limited, avoiding any situation that could place us in a conflict of interest, or create the perception of a conflict of interest. If, and when, a conflict of interest arises, you are required to report the conflict so it can be appropriately investigated and addressed.


You should never make business decisions on behalf of Working at Height Limited based on personal relationships, bias or the potential for personal gain.

Some examples of conflict of interest can include, but are not limited to:

- Gifts, invitations and entertainment
- Outside business activities
- Corporate opportunities
- Directorships or other board positions outside of Working at Height Limited
- Director independence
- Personal Relationships
- Intimate Relationships

What is a conflict of interest?

Conflict of interest means a situation in which Working at Height Group Personnel have private interests that could conflict with their ability to act in good faith and the best interests of the Company, or where they may improperly benefit from knowledge acquired at the Company which is not available to the general public.

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Personal Relationships

Personnel who have a Personal Relationship within the Company must not be in a direct or indirect reporting relationship with each other. In particular, the Company prohibits all Intimate Relationships between individuals in a direct or indirect reporting relationship.

If Personnel are not certain whether a Personal Relationships within the Company is permissible, they should immediately discuss their situation with their Working at Height Limited leader, Human Resources (HR) Consultant or HR Governance.

QUESTION:




I want to hire someone who I know has a family member already working for Working at Height Limited. Is that allowed?

ANSWER:

I want to hire someone who I know has a family member has family members already working for Working at Height Limited provided that person is not in a directly or indirectly (through other leader(s)) reporting to their family member. The onus is on all Personnel to notify HR Governance when they become aware of a Personal Relationship where there is a direct or indirect reporting relationship within the Company

Outside business activities and outside directorships

Personnel must not engage in outside business activities (e.g., as a consultant, employee, or director), that are in conflict with or detrimental to the interests of Working at Height Limited, and which may include:


-  Owning, controlling or directing a material financial interest (greater than one per cent) in a competitor, or in a vendor, supplier, customer or other business which does or seeks to do business with Working at Height Limited.
-  Being involved in a business that competes with Working at Height Limited or that does or seeks to do business with Working at Height Limited.
-  Outside business activities that interfere with Personnel's day-to-day confidentiality or other obligations to Working at Height Limited.

Working at Height Limited Personnel whose spouse, common law partner, or other family member is a supplier or potential supplier to the Company must ensure that they are not involved in the selection process or in directing or influencing the work of the supplier to whom they are related.

In cases where the spouse, common law partner, or other family member of Working at Height Limited Personnel owns, controls, or directs a material financial interest in any of the outside business activities, that Personnel must contact the Cooperate Compliance Department for guidance.

Personnel must declare all outside business activities to the Cooperate Compliance Department.

Personnel must declare all Outside Directorship positions on a board (e.g., board chair, treasurer, secretary, member, etc.) to Cooperate Secretary for review and approval, prior to accepting the position.

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Gifts, invitations and entertainment

Local customs with respect to providing gifts and other benefits can change depending on where we are doing business; however, these local customs must never compromise, or appear to compromise, our ability to act legally, ethically and objectively.

While giving gifts can help to build and maintain strong business relationships, they can also cloud one's judgement or be seen to improperly influence decisions depending on the nature and context of the gift.

Corruption in business and government prevents fair and open competition based on merit and it can have a negative impact for both the Company and the individual. To mitigate these negative impacts, we must all comply with Working at Height Group's Avoiding Bribery and Corruption Policy, Gift, Meals, Entertainment and Travel for Government Officials Standard, and Gifts and Entertainment Policy.

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We must always be prudent in offering gifts, entertainment or anything of value to anyone or any organization that is a competitor or that Working at Height Group does, or seeks to do, business with, or that Working at Height Group requires consent or approval from (e.g., a government authority).

Accepting gifts, invitations and entertainment from suppliers.

Accepting gifts or invitations from suppliers or potential suppliers can affect the way Working at Height Limited is perceived and can run counter to our business objectives and values. We all have an obligation to conduct ourselves in a fair and impartial fashion in all business dealings with the supplier community.

Personnel may accept food and beverages over a business meal, provided it is not lavish, but may not accept invitations to events or sporting activities, cash or cash equivalents, or gifts with a value greater than €50.00/\$51.59/£42.59. Careful consideration must be taken when a supplier extends an invitation to a social event or offers a gift. Please see the Gifts and Entertainment Policy for more information.

4.1.55 Avoiding-Bribery-and-Corruption-Policy Americas.

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Expenses for Government Officials

Engaging with government officials is an important part of Working at Height Limited's business, and during those engagements, expenses for Government Officials may be incurred. You should never provide government officials with bribes, payments, kickbacks, gifts or anything else of value for the purpose of improperly influencing their actions or decisions in Working at Height Limited's favour. These benefits can include entertainment, private parties, charitable contributions or employment opportunities.

Even if there is no intent to influence, you should not provide a payment or benefit to any third party if it could appear to be improper.


4.1.55 Avoiding-Bribery-and-Corruption-Policy Americas.

Many anti-corruption laws allow small gifts or reasonable meals or entertainment for Government Officials in limited circumstances. Only gifts, meals, and entertainment that are reasonable, do not influence business decisions and are not otherwise prohibited may be offered. All gifts, meals or entertainment must be provided in accordance with local laws and regulations, be appropriately recorded in Working at Height Group's books and records, and follow the appropriate approval processes and thresholds as set out in Working at Height Group's Gift, Meals, Entertainment and Travel for Government Officials Standard.

Political contributions and lobbying

Working at Height Limited respects the political process and only makes political contributions and engages in lobbying activities that are legal and transparent. Legal requirements concerning political contributions and lobbying are aimed at preventing corruption in government and at ensuring the proper functioning of the political system. These legal requirements can be complex and vary by jurisdiction (we are not allowed to make political donations at all in some jurisdictions). Therefore, you must seek approval from the appropriate department before engaging in these activities on behalf of Working at Height Limited.

4.1.55 Avoiding-Bribery-and-Corruption-Policy Americas.

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International trade

When engaging in international business and procuring products from the global marketplace, Working at Height Limited complies with all applicable international trade laws, as well as all customs and taxation requirements. International trade laws prohibit or restrict trade with certain countries that are subject to embargoes or sanctions, as well as with certain individuals and organizations (e.g., entities that have ties to actual or suspected terrorists or drug traffickers). These laws also prohibit or restrict imports and exports of certain types of goods, information and technologies and often impose stringent reporting obligations.

Even if Working at Height Group does not have ownership of a product it has purchased when it crosses a border (e.g., because it takes ownership, or title, on delivery), it may nevertheless be responsible for import and/or export compliance based on certain terms of the purchase contract. It is important to ensure the contract does not contain terms that result in Working at Height Group inadvertently taking on these obligations.


Insider trading

We engage only in transactions that have a legitimate business purpose, and we do not interfere with the normal functioning of the markets in which we operate and transact. We also report transactions in accordance with all legal requirements.

Through the course of your work with Working at Height Limited, you may have access to non-public information regarding Working at Height Limited, our customers, Contractors, vendors, suppliers and other business partners.

You must always maintain the confidentiality of any non-public information encountered through the course of business with Working at Height Limited. To the extent non-public information that you are aware of could be material to a decision to buy or sell shares in Working at Height Limited or another company, you and your immediate family members must not trade Working at Height Limited shares or other securities based on that information.

Insider trading is a serious offence and can have significant reputational and legal impacts.

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We conduct business in a way that promotes a fair, efficient and openly competitive operation of markets we participate in and which complies with market manipulation laws.

Complying with regulatory requirements

Working at Height Limited is committed to meeting our obligations under all regulations and tariffs. As a regulated Company, Working at Height Limited is subject to many regulatory requirements, including those of Global Wind Organization, Society of Professional Rope Access Association, National Fire Protection Agency, Occupational Safety and Health Administration, Health and Safety Authority and among others. In addition, Working at Height Limited's transmission providers are subject to tariffs that we must comply with.

Although it is impossible to list all of these requirements here, you must ensure you are familiar with the specific requirements applicable to you in your job. These can include reporting requirements and compliance with technical or other standards such as ANSI, ASTM, BS, EN and among others.

To the extent the requirements of more than one jurisdiction apply, you must comply with the highest of the various standards.

Inter-affiliate interactions

As a training provider Working at Height Limited is subject to the European Qualifications Framework (EQF), Quality and Qualifications Ireland (QQI) & Global Wind Organization's Code of Conduct's and Working at Height Limiteds Code of Conduct.

These Inter-

Affiliate Codes/Standards of Conduct are intended to ensure that our non-regulated affiliates do not receive an unfair advantage over other customers, whether as a result of discriminatory treatment or the improper sharing of information, Personnel or resources.

Our Inter-Affiliate Codes/Standards of Conduct also prohibit cross-subsidization the expense of our training customers.

In order to ensure compliance with the Inter-Affiliate Codes/Standards of Conduct, you must observe the following rules in your day-to-day activities;

All customers must be treated equally


Regulated training providers cannot give undue preference to any customer. whether it is an affiliated Working at Height Limited entity or not.

Independent functioning

Regulated Personnel must function independently of non-regulated Personnel (e.g., they cannot perform the same jobs).

No conduit of information

Regulated and shared Personnel must not share, or act as a conduit for the sharing of regulated information* with non-regulated Personnel.

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Pay fair share

Non-regulated entities must pay their fair share of any costs incurred by our regulated training providers, so as not to burden our training customers with costs our non-regulated entities benefit from.

Reporting violations

Any violations of the Inter-Affiliate Codes/Standards of Conduct must be reported to the Corporate Compliance department, since Working at Height Limited is legally required to either publicly post such information on its IMS-Flex or report it to our regulators.

Competing fairly

A competitive marketplace in the energy and transmission services that Working at Height Limited provides helps ensure fair prices and customer choice and, in turn, results in the industry as a whole providing more effective and better service. We believe in vigorous, fair competition and comply with all laws designed to protect the ability of companies to compete freely.

You should never enter into agreements to:

- Fix prices
- Decrease capacity or volume available to customers
- Allocate customers or markets among competitors
- Boycott certain customers or Contractors

As such, you need to be very careful whenever you have contact with competitors (whether in trade association meetings, at conferences, through participation in benchmarking groups or in negotiating or otherwise dealing with actual or potential joint venture partners who are also Working at Height Limited competitors) to avoid sharing competitively sensitive information. You must never enter into an agreement to reduce competition, or that is likely to have that effect.

Accounting, financial, reporting and fraud prevention


Working at Height Limited ensures that our accounting, financial records and reporting are fair, accurate, understandable and complete, and we do not falsify financial documents or records, or misstate or misrepresent the nature of costs or expenditures.

You must ensure all transactions that you engage in, or that you approve, whether under a Working at Height Limited contract or as an individual business expense, are reported accurately, completely and in compliance with all applicable accounting and legal requirements. You must also follow Working at Height Limited's corporate policies and other requirements respecting the transaction (for example, obtaining of approvals).

You must never engage in "off-the-record" or other transactions or accounts that do not fully and accurately state the nature and amount of specific transactions.

You must also never falsify any invoice, expenditure, time sheet or other document related to Company cost or revenue. Doing so constitutes fraud and may result in disciplinary action up to and including termination.

4.1.55 Avoiding-Bribery-and-Corruption-Policy Americas.

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Working at Height Group Business Expense Policy

The Business Expense Policy outlines proper management of low cost and low risk expenses incurred while conducting business on Working at Height Group's behalf and sets expectations regarding Employee use of the corporate credit card for such expenses.




These expectations include a prohibition on splitting transactions to circumvent credit card limits or incurring costs for other Employees. If there is more than one Employee from the same business unit included in the expense, the most senior Employee present must always incur the expense.

Preventing money laundering and terrorist financing




We expect all our Personnel to be vigilant in ensuring the payments we make and the methods of payment we use are legitimate and legal.

Legal requirements concerning money laundering and terrorist financing are in place to deter criminal and terrorist activities of those with whom we might do business.

To ensure compliance with these legal requirements you must:

-  Exercise care before agreeing to do business with a third-party, including ensuring that they were reviewed as part of Supply Chain's Qualification Process.
-  Ensure the third-party is legitimate and reputable.
-  Recognize and report any suspicious payments or transactions

Examples of suspicious payments or transactions include:

-  Any request by a third-party to have a payment deposited into a personal account rather than a business account.
-  Transactions with entities other than those involved in the underlying contract or business deal
-  Payments or other transactions involving a country other than that in which the parties to the contract or business deal are located

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Ignoring the signs that a transaction or payment initiated by a third party is not legitimate can result in Working at Height Group being found complicit in any illegal activity that may be associated with the transaction, even if the company did not expressly authorize it or even know about it.

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Other potential conflicts of interest

Corporate opportunities

Personnel must not take personal advantage of a business opportunity that you discover through the use of Company assets, property, information or your position with Working at Height Limited, or use Company assets, property, information or your position with Working at Height Limited for personal gain or to compete with Working at Height Limited.

Political office, appointments to boards or tribunals




Personnel may not serve in a political office or on an administrative board or tribunal, if that office, board or tribunal has or may have decision-making authority in respect of any aspect of Working at Height Limited's business (such as the approval of projects or the issuing of permits).

Executive leadership team - other business activities

In addition to the conditions set out in outside business activities and outside directorships section above prior to serving in any capacity in an unaffiliated organization, the Chief Executive Officer and any member of the Executive Leadership Team must obtain the consent of the Governance Committee of the Working at Height Limited's Board of Directors.


Directors' independence

To maintain their independence and to ensure that no relationships exist that may violate applicable corporate, securities and competition laws, all members of the Board of Directors of Working at Height Limited must have their independence assessed:

-  Annually;
-  In the event of a material change in their respective primary employment status; and
-  When they wish to join another board of directors, whether private or public.

All candidates to Working at Height Limited's Board of Directors must declare to the Corporate Secretarial group any material interest that they may have in a contract or transaction.

All members of the Working at Height Limited's Board of Directors who have any material interest in a contract or transaction must recuse themselves from related deliberations and approval.

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Communication

Communications: Being socially responsible

We respect human rights and we are committed to being a good neighbor and supporting and enhancing the communities in which we live and work.

Some of the most important communities our business impacts are Indigenous communities. We are committed to working with these communities, to develop positive, long-term relationships based on mutual trust and respect, and recognizing their diversity and the importance they place on the land, their culture and their traditional way of life.

In addition to working with Indigenous communities, we also work hard to build and maintain relationships with landowners. We recognize the importance of farming to their communities, and actively support farming-related organizations.



Working at Height Group understands the importance that community, Charitable, charitable and other similar non-governmental organizations play in making the communities in which we live and work better places. We actively support these organizations and encourage our personnel to become involved by volunteering and contributing to chartable and other organizations, including during work hours if approved by management

Being a good ambassador of Working at Height Limited

We recognize that we are ambassadors of Working at Height Limited and conduct ourselves in a manner that is respectful and appropriate and that will not harm Working at Height Limited's reputation. You must always keep in mind that you are a representative of Working at Height Limited. The things you say and do should reflect the Company's core values. You should not speak publicly on behalf of Working at Height Limited unless authorized to do so. Any posting or statement on an external website, including personal sites or in other media, should be considered a public statement. Even on your personal time, you must not participate in any illegal or inappropriate statements or activities that could be detrimental to the Company or its reputation

Social media and Communications with the public.





In the age of social media, it is easy to broadly and publicly communicate information. You need to be particularly aware of your obligations and our expectations when it comes to the disclosure of Company information and ensuring it is in accordance with legal and internal requirements.

When sharing information on social media, keep the following requirements in mind:



Do not speak on behalf of Working at Height Limited unless you have been authorized to do so.

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-  Do not post anything that reflects negatively on Working at Height Limited and ensure posts are not discriminatory, offensive, or in poor taste
-  Never falsely represent yourself
-  Share only approved Working at Height Limited content, add value to the conversation, and be accurate.
-  Do not post pictures of Working at Height Limited's facilities or operations unless you are authorized to do so.

Public disclosure of information

Working at Height Limited ensures that public statements regarding the Company are provided in a timely manner, are fair, accurate and complete, comply with legal requirements and corporate policies, and preserve and protect our reputation and brand.

Working at Height Limited has prescribed Personnel who are authorized to speak on our behalf. If you receive an inquiry for information or comment, you should direct it to the appropriate Company representative for response.

If you are not sure who the appropriate company representative is to respond, Please direct the inquiry to the management team.



Use of company name for personal gain

You must never use the company name for purchasing power or your employment status to obtain personnel discounts or rebates from vendors, unless those discounts or rebates are available to all employees.

Dealing fairly with customers, suppliers and other stakeholders


We consider the impact of our actions on stakeholders, the environment and the communities in which we operate. We follow the requirements of Working at Height Limited's Operational Management System (Flex) which are in place to make sure we act responsibly to protect us, our co-workers, our workplace and assets and the communities we work in, and that we act as responsible stewards of the environment. (Flex) provides a strong foundation to manage risk, share knowledge and best practices, and it ensures continual improvement of the business. You should never make business decisions on behalf of Working at Height Limited based on personal relationships, unfair bias or the potential for personal gain.



Treating customers, Contractors, suppliers and other stakeholders fairly requires that you:

- Enter into business relationships based on merit
- Use objective criteria to evaluate them, such as:
 - Price
 - Quality
 - Service

It also requires that you are honest and forthright when dealing with others (never omitting important facts, manipulating another person or situation, or misrepresenting yourself or Working at Height Group), and that you honor Working at Height Group contractual regulatory and other commitments

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Dealing fairly with competitors

You must ensure that you use only legitimate means (such as searches of public information) to obtain competitive intelligence.

You must never use deceit or misrepresent yourself to obtain such information, and you should never take advantage of information you receive in error, for example:

- Emails or faxes received in error
- Physical documents left in a meeting room or in a public place or which have been sent to you in error
- Information you overheard

Assets and information


- Protecting confidential information
- Protecting personal information
- Managing and maintaining the security of information
- Protecting and respecting intellectual property rights
- Use and protection of Working at Height Limited assets

Protecting confidential Information

We protect Working at Height Limited's confidential information, and that of our customers, suppliers, Contractors and other stakeholders, from improper disclosure and use.

We all have access to confidential information. Working at Height Limited confidential information includes all Working at Height Limited non-public information that may be of use to competitors or harmful to Working at Height Limited or its customers,

- ① Information regarding Working at Height Limited's business, finances, strategies, business plans, clients, training programs or projects.
- ① Proposed mergers, acquisitions and divestitures.
- ① Engineering designs and reports
- ① Legal proceedings, contracts.

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- ① Environmental reports
- ① Technical and economic data
- ① Land or lease information
- ① Marketing information and operations, field notes.
- ① Electronic information assets including emails, voicemails and text messages.
- ① Computer records or software specification models.
- ① Other information which is or maybe either applicable to or related in any way to the assets, business or affairs of

Working at Height Limited.

Because such information is sensitive and can be used by competitors or others to Working at Height Limited's detriment, it must be protected. You must not disclose such information to anyone who does not need to know the information for legitimate business purposes (including within Working at Height Limited).

All confidential information should be protected from unauthorized access. When disposing of confidential information, you should do so in a secure manner, which may include shredding of hard copies.

Protecting Personal Information

Working at Height Limited takes seriously the fact that its Personnel, customers, Contractors, vendors, suppliers and other stakeholders have entrusted the Company with their personal information.

Some examples of personal information include an individual's name, home address, telephone number, identification numbers (such as an employee number or Personal Public Service Number (PPSN) in Ireland, National Insurance Number (NINO) in the UK, Social Insurance/Social Security Number (SI/SSN) in the USA), financial information, and medical information.


You should never collect, store, access, use, or disclose personal information for an inappropriate purpose or by inappropriate or illegal means. To the extent that you have personal information of any individual as a result of your work with Working at Height Limited, whether the individual is an employee, a client or a shareholder (to name just a few examples), you may not disclose that personal information to others, either within or outside Working at Height Limited, without the express approval of Working at Height Limited's Privacy Officer or the individual's written consent.

If you are ever unsure if information can be disclosed, you should check with Working at Height Limited's management before taking any action.

4.1.20 General Data Protection Regulation GDPR & GICG & 4.1.27 Employee Privacy Policy



Working at Height Group is committed to protecting personal information in compliance with all the legal requirements and requires that our contractors, Vendors and suppliers share this commitment to information security.


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Managing and maintaining the security of Information

Company records are valuable assets of the Company and you must ensure appropriate and reasonable efforts are made to manage, protect and preserve these assets. All of these information assets are important Company records that Working at Height Limited may be required to produce in the event of a legal or regulatory proceeding, audit or investigation. It is important that you manage and retain these assets in accordance with all legal requirements and Working at Height Limited's corporate policies. In particular, you must never destroy information asset in the event of a legal hold or an actual or pending legal or regulatory proceedings.

4.1.11 IT, Phone, Multimedia Policy, 4.1.20 General Data Protection Regulation GDPR & GICG, 4.1.54 Communications Policy & 4.1.56 Protection of Personal Information Policy.

<p>What is an information asset?</p> <ul style="list-style-type: none"> • Memos • Emails • Accounting records • Invoices and contracts • Technical drawings • Recordings of trade-related phone calls. • Records of safety or other Incidents. • Marketing literature • Other similar types of records 	<p>What form can an information asset take?</p> <p>An information asset can take any form or on any media, including:</p> <ul style="list-style-type: none"> • Paper • CD • DVD • Voice or video recordings • Text and instant messages • Other electronic formats
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Protecting and respecting intellectual property rights

We preserve Working at Height Limited's intellectual property rights and respect and honor those of third parties.

Intellectual property can include trade secrets, which is any information that gives the owner an economic advantage over its competitors and that the owner takes reasonable steps to keep confidential, as well as copyrights, trademarks and patents. We must take steps to protect intellectual property rights. This includes keeping trade secrets confidential, consistently using Working at Height Limited's trademarks solely as authorized, and respecting the intellectual property rights of third parties.

Working at Height Group respects and honors intellectual property rights by:

- Complying with the terms of license agreements that Working at Height Group has entered into with vendors, suppliers and contractors.
- Complying with copyright legislation
- Not using improper means to obtain third party information or trade secrets.
- Using confidential third-party information only for the purpose for which it was provided.

Use and protection of Working at Height Limited's assets


Working at Height Limited assets you have access to assist in completion of your duties must be protected and only used for legitimate business purposes.

You have an obligation to be a good steward of the assets that Working at Height Limited provides to you in the course of your work and you must protect assets from loss, theft, damage and misuse.

Additionally, using Company facilities and/or equipment to work on your personal assets, for personal activities or to store personal assets is not allowed.

Limited personal use of Company assets such as accessing Internet or printing is acceptable provided that it does not interfere with your job duties. Working at Height Limited regularly monitors Company internet use, and individuals should not assume any right of privacy with respect to either their use of or data stored on Working at Height Limited's computer systems.

Any misuse of Company assets or services, including inappropriate use of Working at Height Limited's computer equipment and systems, may lead to serious consequences including corrective disciplinary action up to and including termination

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<p>Company asset?</p> <p>Company asset can include:</p> <ul style="list-style-type: none"> ① Equipment ① Facilities ① Furniture ① Computers ① Telephones ① Supplies ① Tools ① Personnel protective equipment. ① Corporate Credit Cards. ① Other Recourses 	<p>Our assets are NOT be used for?</p> <p>Company asset can include:</p> <ul style="list-style-type: none"> ① Work on your personal assets or for personal activities. ① Engaging in hate-based activities. ① Downloading illegal material. ① Viewing pornography. ① Other inappropriate uses.
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Have a question? We're here to help



Compliance and non-retaliation



Asking questions

Compliance

Working at Height Limited requires that our Employees and contractors comply with all aspects of this Policy and support others in doing so. You are responsible for promptly reporting suspected or actual violation of COBE, the associated and referenced policies, applicable law or any other concern, through available channels so that it can be appropriately investigated, addressed and handled. Anyone who fails to comply, or knowingly permits Personnel under their supervision not to comply, with the requirements set out in this document or any Working at Height Limited rules and guidelines may lead to serious consequences including corrective disciplinary action, removal from our site(s) in accordance with the Working at Height Limited's policies and processes, or termination of the business relationship.

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Non-retaliation

We support and encourage you to report suspected instances of potential non-compliance with applicable laws, regulations and authorizations, as well as hazards, potential hazards, incidents involving health and safety or the environment, and near hits. We take every report seriously, investigate each report to identify facts, and make improvements to our practices and procedures when warranted.

All Employees and Contractors making reports in good-faith will be protected. We ensure immunity from disciplinary action or retaliation for Contractors, vendors and suppliers for the good-faith reporting of such concerns. Reports can be made to a Working at Height Limited leader, your Working at Height Limited representative, or anonymously to the Management Team.

Good-faith reporting is intended to remove protection for Contractors, vendors and suppliers making intentionally false or malicious reports, or who seek to exempt their own negligence or willful misconduct by the act of making a report.

Asking questions and reporting concerns

You are required to report any actual or potential non-compliance with COBE, any other Working at Height Limited policies, or any legal obligation, as it applies to you or the Company, so it can be appropriately investigated and addressed. You can do so with confidence that your confidentiality and identity will be protected to the greatest extent possible and that retaliation for good faith reporting is prohibited.

Ethics Help


Although Working at Height Limited has various reporting resources available for Personnel to report a concern or to seek guidance, there may be times when you are not comfortable raising concerns through those resources.

All Working at Height Limited personal is welcome to report any via our reporting form powered by google forms this form is totally anonymous.

If the issue raises an immediate threat to safety or security, you should contact Corporate Security, local police or other emergency services as appropriate

All reports are taken seriously

Regardless of the means used to report, you can feel confident that the report will be taken seriously and that it will be investigated and addressed appropriately. If you are reporting anonymously through the google forms.

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Participation in investigations and audits

Personnel, including directors and officers are required to participate in investigations and audits if, and as, requested.





QUESTION: I suspect one of my colleagues has violated part of COBE, but I'm not sure my suspicions are correct. I'm concerned I'll be labeled a tattle-tale (or worse) if I report it. What should I do?

ANSWER: If you suspect misconduct, you should report it so it can be investigated. If it turns out not to be an issue, there will be no harm done. However, violations of the law or COBE that are not reported, cannot be addressed, and that can seriously undermine the Company. If that happens, we all suffer. If you report the issue, your confidentiality and identity will be protected and if any retaliation is found to occur, it will be taken very seriously.

Glossary.

Confidential Information means all Working at Height Limited non-public information that may be of use to competitors or harmful to Working at Height Limited or its customers, suppliers, or other stakeholders, if disclosed. It can include, but is in no way limited to, information regarding Working at Height Limited's business, operations, finances, strategies or business plans, projects, proposed mergers, acquisitions and divestitures, engineering designs and reports, legal proceedings, contracts, environmental reports, land, and lease information, technical and economic data, marketing information and field notes, sketches, photographs, electronic information assets (including emails, voicemails, SMS, and text messages), computer records or software, specifications, models, or other information which is or may be either applicable to or related in any way to the assets, business or affairs of Working at Height Limited.

Contingent Workforce Contractor (CWC) means an individual who typically:

-  Is employed by a third party to work on behalf of Working at Height Limited.
-  Uses Working at Height Limited's assets (e.g., workstation, email, phone) and corporate services.
-  Is compensated on an hourly or daily rate basis; and
-  Works under the direction of a Working at Height Limited leader.

Contractor means a third party hired by Working at Height Limited to perform services for or supply equipment, materials, or goods to the Company. Contractors include, without limitation, Contingent Workforce Contractors and Excluded Contractors.

Employee means full-time, part-time and student employees of Working at Height Limited.


Good Faith Reporting means an open, honest, fair and reasonable reporting without malice or ulterior motive.

Government Officials means any appointed, elected, or honorary official or any Employee of a government, of a government owned or controlled company, or of a public or international organization.





This definition encompasses officials in all branches and at all levels of government:

Local, International, Country, County, Federal, State/provincial.

This definition also includes political parties and party officials and candidates for political office. Indigenous officials may also be considered Government Officials. A person does not cease to be a Government Official by claiming to act in a private capacity

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or by the fact that he/she serves without compensation. Examples of Government Officials relevant to Working at Height Limited's business are;

-  Government ministers and their staff.
-  Officials or Employees of government departments
-  Judges and judicial officials; and
-  Employees of state-owned oil companies, or other government owned or controlled corporations.

Personal Relationship means all Family Relationships and Intimate Relationships and any other personal relationship that is sufficiently close to create a real or perceived conflict of interest.

Personnel means full-time, part-time and temporary Employees and Contingent Workforce Contractors of Working at Height Limited.

Records means information created, received and maintained as evidence by an organization or person, pursuant to legal obligations or in the transaction of business. Records include, but are not limited to, electronic and physical formats. They provide proof of what happened, when it happened, and who made decisions. Whether information is identified as a Record depends on the information it contains and the context

Working at Height Limited or the Company means Working at Height Limited Corporation and its wholly-owned subsidiaries and/or operated entities.