



Wisdom, Strength, Endurance & Resilience.

**Working at Height Group™**  
Advanced Technical Rescue & Safety Education

# Working with Working at Height Group

## Contractor Code of Business Ethics (COBE) Handbook



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"Business with Altitude"  
**WORKINGatHEIGHT.us**  
**WORKINGatHEIGHT.ie**  
Safety – Service – Efficiency

# Message from Adrian McMahon

**At Working at Height Group, our stakeholders count on us to make the right choices and do the right thing. It's ingrained in who we are and how we do business, every day.**

**While our corporate values – safety, integrity, responsibility and collaboration – form the foundation of how we do business, our Code of Business Ethics (COBE) and this COBE Contractor Handbook go one step further. COBE helps us put those values into practice in our daily decisions and activities, and it helps clarify what making the right choices and doing the right thing really mean.**

**As a contractor with Working at Height Group, it's important that you understand the principles set out in COBE, and that you refer to COBE and this Handbook regularly. COBE sets out the type of behaviour expected of you while working with Working at Height Group, and this COBE Handbook will help you understand those expectations and guide you in the ethical situations you may face at work.**

**It takes all of us making the right choices and doing the right thing together to ensure Working at Height Group continues to be a company that our stakeholders can count on.**

**I am proud to work for Working at Height Group. I can confidently say, we do the right thing, and we do things right. As a contractor with Working at Height Group, it's important that you live by that mandate too.**

**Sincerely,**

*Adrian McMahon.*

Founder & CEO Working at Height Group

01/06/2021



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# Our expectations and your responsibilities

This Contractor Code of Business Ethics (COBE) Handbook reinforces Working at Height Group's (the Company's) requirements and expectations for conducting business with us or on our behalf. This Handbook is intended to supplement the terms and conditions of your agreement with Working at Height Group and to serve as a reference and provide guidance on our requirements and expectations. The Handbook does not supersede our policies, but rather, functions in concert with them. As such, if there are any conflicts or ambiguities between this Handbook and other Working at Height Group policies, Working at Height Group policies will prevail.

We expect you to understand these requirements and to be knowledgeable on how you are required to meet Working at Height Group's standards. We expect compliance with all applicable laws, regulations, policies and rules.

We expect our contractors, vendors and suppliers to meet the same standards as Working at Height Group. If you are unsure of what standard you need to comply with, you should contact your Working at Height Group representative.

Failure to comply with the requirements set out in this document, or any Working at Height Group rules and guidelines, may lead to serious consequences including termination of the business relationship.



Look for this symbol throughout the Contractor COBE Handbook to guide you to relevant policies available on our IMS log in via our website at: [www.workingatheight.ie](http://www.workingatheight.ie) or [www.workingatheight.us](http://www.workingatheight.us)



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# Our values

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## Safety

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

## Integrity

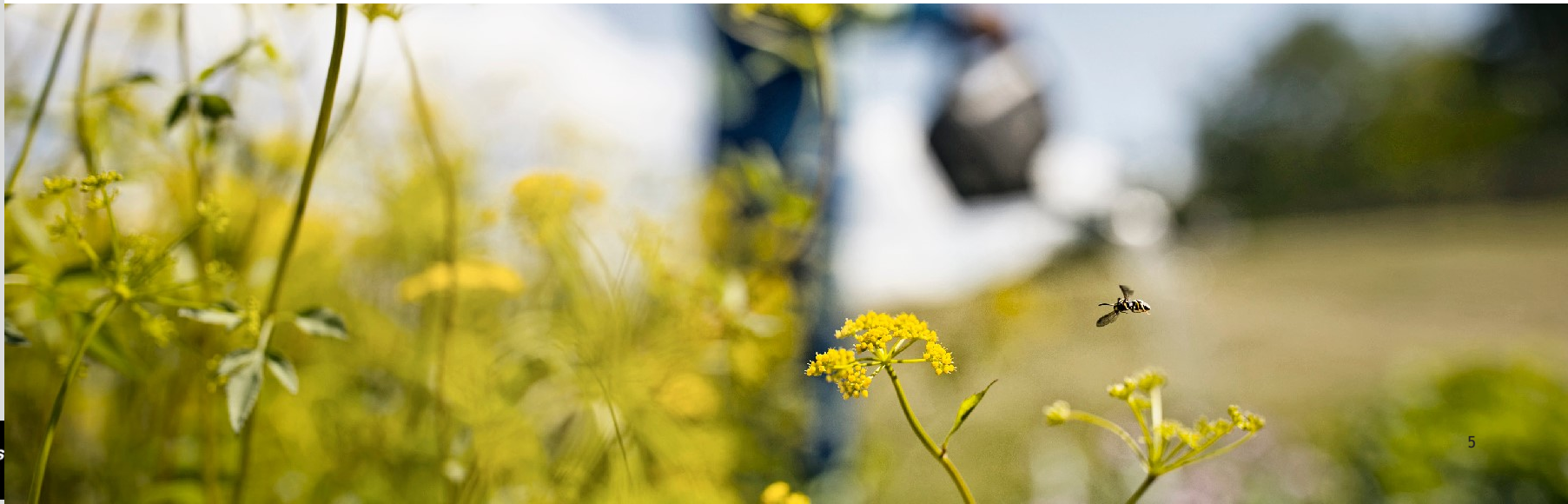
We act with high ethical standards, treat others with honesty and respect and keep promises and commitments to stakeholders.

## 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.



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## Living our values

- Making the right choices and doing the right thing
- 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
- Weapons in the workplace



# Making the right choices and doing the right thing

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At Working at Height Group, making the right choices and doing the right thing isn't just a catchphrase – 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 this Handbook, including:

- ☞ Reporting all health, safety and environment related hazards, potential hazards, incidents, near hits and unsafe acts
- ☞ Complying with the applicable legal requirements and corporate policies that impact your daily work
- ☞ Reporting, through appropriate channels, any instances of actual or potential non-compliance with legal requirements or with this Handbook that you become aware of
- ☞ Not retaliating against anyone for the good-faith reporting of an incident or issue
- ☞ Supporting others in making the right choices and doing the right thing

## If you're ever unsure, ask ...

If you are ever unsure of how to make the right choices and do the right thing, it is always better to ask. The consequences of violating the law, this Handbook or any corporate policy are very serious and can include disciplinary action up to and including termination of the business relationship. In some circumstances, inappropriate conduct may also need to be reported to the authorities, and Working at Height Group could bring legal action against those involved. By asking before you act, you protect both yourself and the Company.



# Zero Injury's & Zero Harm is Real

*If it isn't safe, we won't do it. By reinforcing a disciplined set of rules and providing rigorous training, we approach every day with our goal of a zero-incident workplace*

## Protecting health, safety and the environment

Our commitment to safety isn't just a mantra – it's how we work 24/7, 365 days of the year across our entire organization.

We expect that our contractors, vendors and suppliers share Working at Height Group's commitment to safety.

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



### 3.0.4 Health Safety & Environment Commitment Statement



# Health, Safety & Environment



# Working at Height Group's Life Saving Rules

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

## Working at Height Group's Life Saving Rules are:

- ✔ Drive safely and without distraction
- ✔ Use the appropriate personal fall protective 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

Committing to Working at Height Group's Life Saving Rules means meeting our goal of everyone going home safe from our offices, facilities and projectsites, every day. Nothing is more important.

# LIFE SAVING RULES



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# Alcohol and Drug use

Working at Height Group does 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 illegal.

Given the nature of Working at Height Group's business, it is essential that all workers 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.

Working at Height Group takes a zero-tolerance approach toward the use of alcohol and drugs and intoxication while working on our behalf. You must always report fit-for-work and remain fit-for-work while engaged in any Working at Height Group business. Inability to do so will result in being removed from our site(s) and possible termination of our business relationship.

## **4.17 & 4.17a Alcohol and Drug Policy** **4.1.35 Training and Work Fitness Policy**

### 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 alcohol or drugs. 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.

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## Diversity and employment equity

Working at Height Group 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.

Working at Height Group reserves the right to conduct independent investigations depending on the severity of the allegations or the complexity of the investigation, and also reserves the right to remove any person from its property.

**Working at Height Group requires you to be inclusive and to demonstrate respect for others."**

**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
- religion
- age
- sexual orientation
- marital status
- family status
- veteran status
- disability
- conviction

# DIVERSITY & EQUITY



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*Working at Height Group requires that we treat one another with dignity and respect, and we are committed to maintaining a work environment that is free of harassment, violence and weapons.*

## Harassment and violence-free workplace

Everyone deserves to do their job in a safe environment, without fear of harassment or violence.

You must always be respectful to your co-workers and be sensitive to the way in which others may react to your behaviours and comments. Always try to resolve differences in a calm and respectful manner, without resorting to insults, threats or violence.

This includes displaying any statements, messages, or images (e.g., on clothing, stickers on hard hats, decals on vehicles, etc.) which are prohibited by Working at Height Group or which create an inappropriate work environment.

Working at Height Group prohibits any behaviour that is:

- ☞ intimidating
- ☞ hostile
- ☞ offensive
- ☞ threatening
- ☞ violent
- ☞ demeaning or humiliating
- ☞ of a sexual nature
- ☞ or any other action which creates an inappropriate work environment

### 4.1.61 Harassment-Free Workplace Policy

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

- gender
- race
- national or ethnic origin
- disability
- religion
- age
- sexual orientation
- marital or family status
- veteran status
- National Guard or reserve unit obligations
- a conviction
- political decisions or affiliations
- any other legally protected status

It is our  
**duty**  
 to build a workplace that is  
**free from harassment and violence.**



# Weapons in the workplace

Unless otherwise prohibited by law, we prohibit the possession, use, carrying and transportation of any dangerous or potentially dangerous weapons, as defined by Working at Height Group'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.

*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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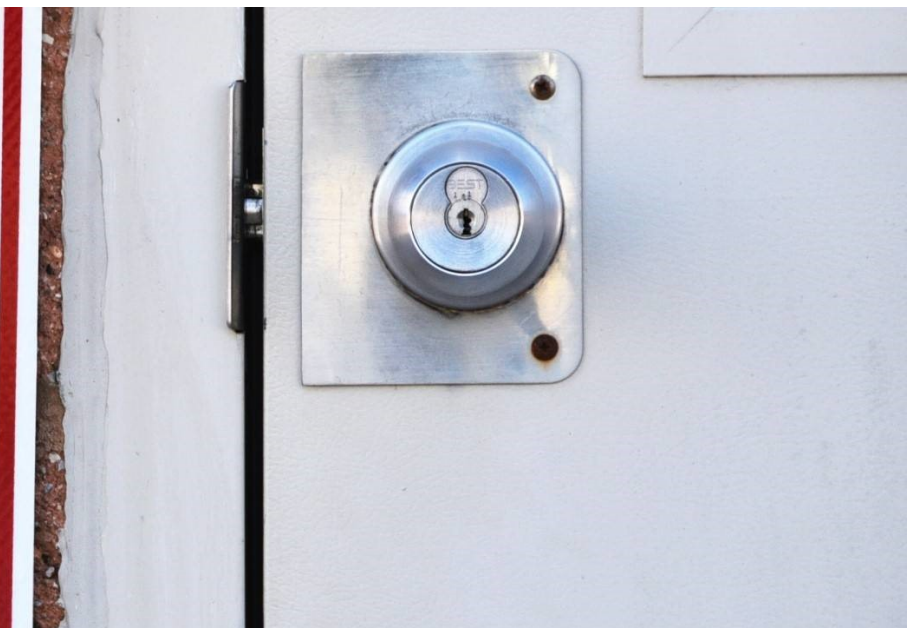
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## 4.1.53 Weapons in the Workplace Policy



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# Ethical Business Conduct

- Avoiding conflicts of interest
- Gifts and entertainment
- Engaging government officials
- Insider trading
- Complying with regulatory requirements
- Inter-affiliate interactions
- Competing fairly
- Accounting, financial reporting and fraud prevention





# Avoiding conflicts of interest

*Integrity is one of our core values. In simple terms this means making the right choices and doing the right thing – always. At Working at Height Group, this is part of who we are and how we do business, every day.*

We act in the best interest of Working at Height Group, avoiding situations 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 expected and required to report the situation so it can be appropriately investigated and addressed. See the “Asking Questions and Reporting Concerns” section of this Handbook for more information.

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

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# Gifts and entertainment

Expectations around providing gifts and other benefits can change depending on where we are doing business; however, local custom must never compromise, or appear to compromise, our ability to act legally, ethically and objectively.

Corruption in both business and government is a problem since it prevents fair and open competition based on merit. All contractors, vendors, and suppliers acting on our behalf must comply with Working at Height Group's Avoiding Bribery and Corruption Guideline for Contractors and Working at Height Group's Code of Business Ethics (COBE), including with respect to giving and accepting any gifts, meals, entertainment and invitations.

Since Working at Height Group can be held responsible for improper payments and benefits provided by contractors, vendors, suppliers and other third parties acting on Working at Height Group's behalf, you must also ensure that the subcontractors with whom you have agreements are legitimate, reputable parties who understand their obligations not to provide any improper payments or benefits in connection with the business they do for Working at Height Group.

## What gifts, entertainment and invitations can Working at Height Group personnel accept?

Accepting gifts or invitations can affect the way Working at Height Group is perceived and can compromise our business objectives and values.

Keep the following requirements in mind when deciding whether or not to give gifts or entertainment to Working at Height Group personnel:

- ☞ The provision of gifts, meals or entertainment should occur infrequently and must not be lavish.
- ☞ Never offer cash, cash equivalents, shares or securities.
- ☞ Never give a gift, entertainment or benefit that could be considered offensive or in poor taste, or that could damage Working at Height Group's image and reputation.
- ☞ Never give a gift, entertainment or benefit in exchange for a business advantage.
- ☞ During the normal course of business, invitations for meetings over meals and beverages are acceptable provided they are not lavish in nature.
- ☞ Other types of invitations, such as sporting events, golf rounds or other types of trips are not acceptable.
- ☞ Occasional promotional gifts (such as pens, coffee mugs, calendars) may be accepted as a customary business courtesy, provided that the
  - ☞ frequency of gift must not exceed four times per calendar year and a value of \$,€,£ 50 per gift or total more than \$,€,£ 100 in aggregate for the calendar year.



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# Engaging government officials

Engaging with government officials is an important part of Working at Height Group'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 Group's favour. These benefits can include entertainment, private parties, charitable contributions or employment opportunities.

In the event that a legitimate expense for a government official is incurred, it must always be appropriately accounted for in Working at Height Group's books and records.

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.

*If you have any questions or concerns about engaging with government officials or tracking necessary expenses, contact your Working at Height Group representative.*

## **P** 4.1.55a Avoiding Bribery and Corruption Guideline for Contractors

### Examples of government officials relevant to Working at Height Group's business include:

- government ministers and their staff;
- officials or employees of government departments;
- employees of regulatory agencies;
- judges and judicial officials;
- Indigenous officials (e.g., members of the band council including council chiefs, hereditary chiefs, and anyone who works for or on behalf of the band corporation); and
- employees of state-owned companies, or other government-owned or controlled corporations



## Insider Trading

Through the course of your business with Working at Height Group, you may have access to non-public information regarding Working at Height Group, 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 Group. 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 Group or another company, you and your immediate family members must not trade Working at Height Group shares or other securities based on that information.

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





# Complying with Regulatory Requirements

Working at Height Group is committed to meeting our obligations under all regulations and tariffs.

As a regulated Company, Working at Height Group is subject to many regulatory requirements, including those of the International Standardization Organization (ISO) In addition, Working at Height Group must comply with QQI, EQF, ANSI, ASTM, BS8454, ISO22846, NFPA, NIOSH, SPRAT & Global Wind Organization guidelines.

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.

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



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# Inter-affiliate interactions

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As a training provider, Working at Height Group is subject to the Quality & Qualifications Ireland, European Qualifications Framework, ISO 45001, 9001, 14001, GWO & SPRAT Code's of conduct and bylaws. 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 may not give undue preference to any customer, whether it is an affiliated Working at Height Group 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.

- **Pay fair share**

- Non-regulated entities must pay their fair share of any costs incurred by our regulated transmission providers, so as not to burden our transmission 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 Group is legally required to either publicly post such information on its web site or report it to our regulators.

*\*Regulated information (which may not be shared with non-regulated Personnel) includes commercial, financial, strategic, planning, operational and customer information of our training providers.*





# Competing fairly

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A competitive marketplace in the energy training services that Working at Height Group 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, contractors, vendors, and suppliers

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 Group 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

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Working at Height Group 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. We expect our contractors, vendors and suppliers to have similar policies and procedures in place to ensure their accounting and financial reporting comply with appropriate accounting principles and best practices.

You must ensure all transactions that you engage in, or that you approve, whether under a Working at Height Group contract or as an individual business expense, are reported and that the reporting is accurate, complete and complies with all applicable accounting and legal requirements. You must also follow all relevant 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 immediate termination of the business relationship.

## 4.1.55 Avoiding Bribery and Corruption Policy





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# Communication

- Dealing fairly with stakeholders
- Social media and communication with the public
- Being socially responsible and a good ambassador

# Dealing fairly with stakeholders

We are proud of our long-standing reputation in dealing fairly and honestly with our customers, contractors, vendors, suppliers and other stakeholders, and we honour our obligations and commitments to them.

As a representative of Working at Height Group, treating customers, contractors, vendors, suppliers and other stakeholders fairly requires that you enter into business relationships based on merit and objective criteria, such as price, quality and 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's contractual, regulatory and other commitments.

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

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# Social media and Communications with the public

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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 Group unless you have been authorized to do so
- Never falsely represent yourself as an employee of Working at Height Group
- Do not post anything that reflects negatively on Working at Height Group and ensure posts are not discriminatory, offensive, or in poor taste
- When posting, share approved Working at Height Group content, add value to the conversation, and be accurate
- Do not post pictures of Working at Height Group's facilities or operations unless you are authorized to do so

## Public disclosure of information

Working at Height Group 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 Group 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.



You must keep in mind that you are a representative of Working at Height Group. The things you say and do should reflect the Company's core values.

## Being socially responsible and a good ambassador

Working at Height Group respects human rights and we are committed to being a good neighbour and supporting and enhancing the communities in which we live and work.

Some of the most important communities our business impacts are the 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.

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.

### 4.1.60 Indigenous Relations Policy





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# Assets and information

- Protecting personal information
- Managing and maintaining the security of information
- Use and protection of WorkingatHeightGroup assets



# Protecting Personnel Information

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Working at Height Group takes very seriously the fact that its personnel, customers, contractors, vendors, suppliers and other stakeholders have entrusted the Company with their personal information.

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Some examples of personal information include an individual's name, home address, telephone number, identification numbers (such as an employee number or social insurance/social security number), financial information, and medical information.

Living our values

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 Group, whether the individual is an employee, a landowner 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 Group, without the express approval of Working at Height Group's Privacy Officer or the individual's written consent.

Ethical business conduct

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

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For more information, please see the Protection of Personal Information Policy.

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

## **P** 4.1.56 Protection of Personal Information Policy

Use of personal information must be limited to the business purposes for which the information was provided. You should also protect and safeguard personal information from inappropriate access, by keeping it in a locked cabinet, or in a password protected or otherwise restricted folder, memory stick or other similar storage device, if the information is electronic.





# Managing and maintaining the security of information

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Corporate records are valuable assets of the Company and you must ensure appropriate and reasonable efforts are made to manage, protect and preserve these assets.

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All of these information assets are important Company records that Working at Height Group 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 corporate policies. In particular, you must never destroy an information asset in the event of an actual or pending legal or regulatory proceeding.

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All contractors, vendors and suppliers are responsible for keeping accurate records of their Company business.

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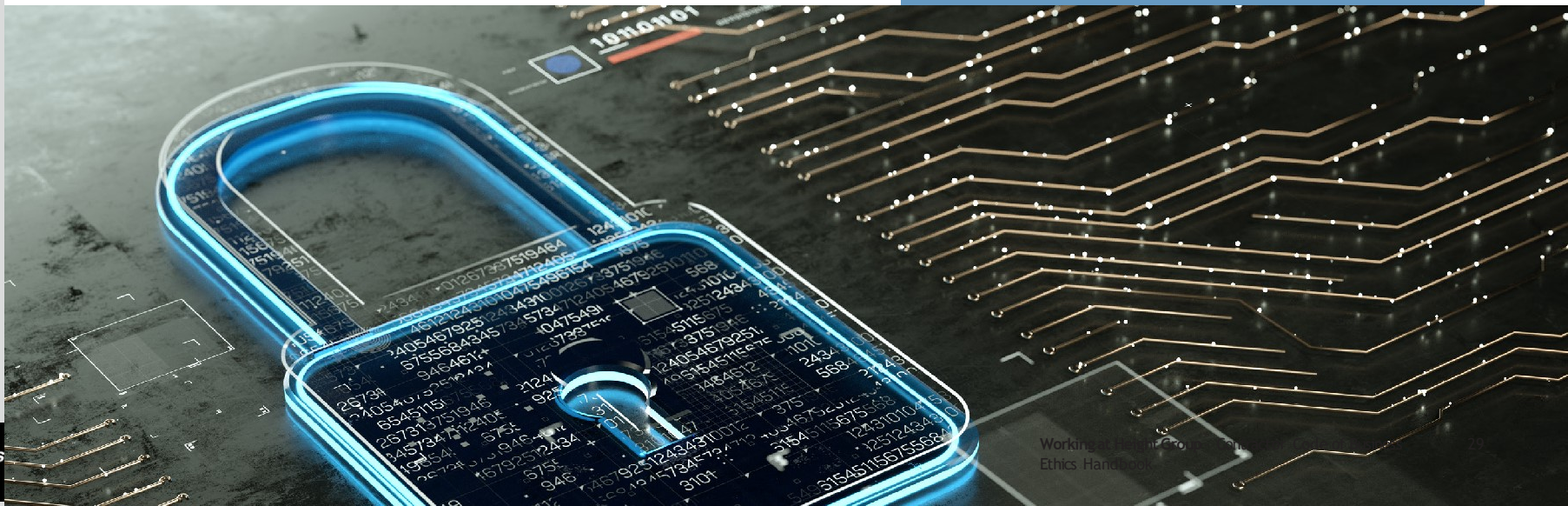
## What is an information asset?

- 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 protected internal documents

## What form can an information asset take?

An information asset can take any form or on any media, including:

- paper
- CD
- DVD
- voice recordings
- text and instant messages
- other electronic formats



# Use and protection of Working at Height Group assets

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If you have been assigned Working at Height Group assets in order to assist in completion of your contract assignment, you must protect Working at Height Group's assets and use them only for legitimate contract assignment purposes.

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You have an obligation to be a good steward of the assets that Working at Height Group provides to help you complete your contract assignment and you must protect assets from loss, theft, damage and misuse.

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

Ethical business conduct

Working at Height Group 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 Group's computer systems. Any misuse of

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Company assets or services, including inappropriate use of Working at Height Group's computer equipment and systems, may lead to serious consequences including corrective disciplinary action, removal from our site(s)

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in accordance with the Working at Height Group's policies and processes, or to termination of the business relationship.

Have a question?  
We're here to help

## What is a Company asset?

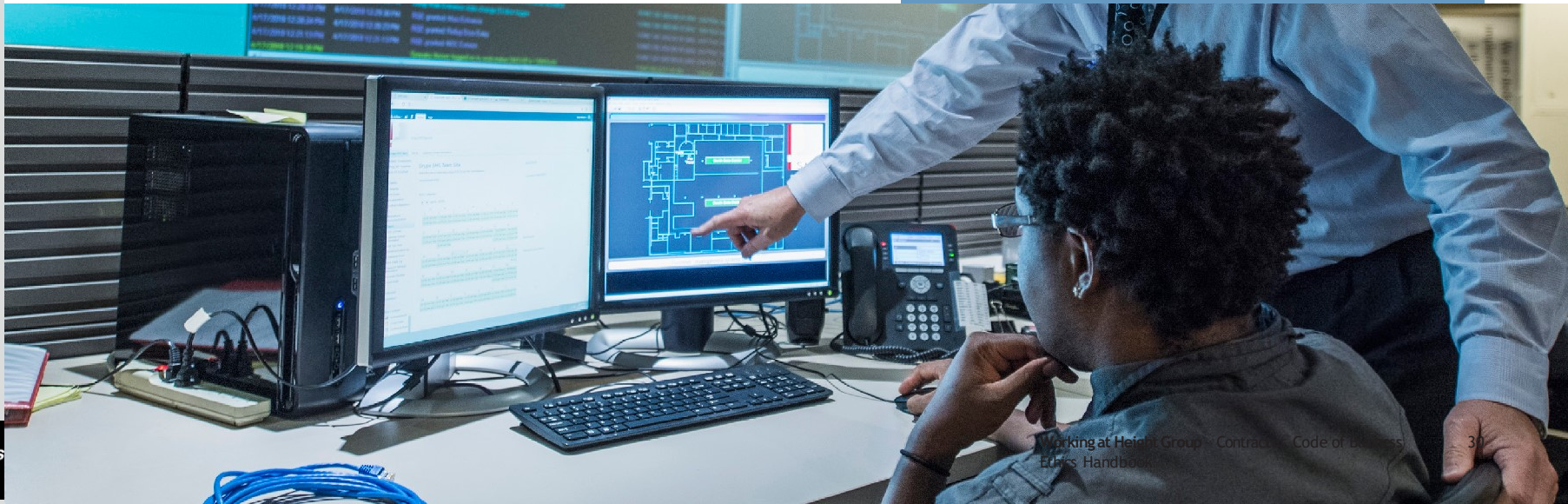
Company assets can include:

- equipment
- facilities
- furniture
- computers
- telephones
- supplies
- tools
- personal protective equipment
- corporate credit cards
- other resources

## What can Company assets NOT be used for?

Company assets must never be used for:

- work on your personal assets or for personal activities
- engaging in hate-based activities
- downloading illegal material
- viewing pornography
- other inappropriate uses





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# Have a question? We're here to help

- Compliance and non-retaliation
- Asking questions and reporting concerns

## Compliance

Working at Height Group requires that our contractors, vendors and suppliers comply with all aspects of this Handbook and support others in doing so. You are responsible for promptly reporting suspected or actual violation of this Handbook, 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 Group rules and guidelines may lead to serious consequences including corrective disciplinary action, removal from our site(s) in accordance with the Working at Height Group's policies and processes, or termination of the business relationship.

## 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 contractors, vendors and suppliers 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 Group leader, your Working at Height Group representative, or anonymously to the Ethics Help Line.

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

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You are required to report any actual or potential non-compliance with this Handbook or any legal obligation 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 Line

There may be times when you are not comfortable raising concerns with your Working at Height Group representative; this is why we have the Working at Height Group Ethics Help Line.

You may use the Ethics Help Line either to report any actual or suspected issues or to ask questions, including topics such as:

- accounting irregularities
- alcohol and drug abuse
- conflict of interest
- employee concern
- employment practices
- engineering concerns
- environment
- equitable treatment
- safety
- harassment
- theft and fraud
- workplace violence
- other improprieties

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 as appropriate. If you are reporting anonymously through the Ethics Help Line, save your key code in case the investigator needs to communicate with you for further information or clarification prior to initiating an investigation.



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Wisdom, Strength, Endurance & Resilience.

**Working at Height Group™**  
**Advanced Technical Rescue & Safety Education**



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