

Code of Conduct & Manual for Health, Safety and Environment

Our Objectives:

0 accidents or injuries

100 % safety and well-being

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1. INTRODUCTION

The LCS group of companies is an ambitious employer. It belongs to the best in its industry.

In all its activities, its focus on the one hand is on

- Health
- Safety
- Environment
- Quality

in order to guarantee a good working environment and a safe and healthy workplace.

Equally important for Management, however, is always ethically correct business dealings. Employees must always be respectful, responsible, honest, and upright in dealing with other colleagues, customers, suppliers, and other business partners.

**Our success depends on each and every one of us always behaving properly.
Thank you for contributing.**

Christoph Ludescher

Oswald Dejaco

2. DEFINITIONS

HSE is the abbreviation for safely, health and environment. What do these three concepts mean?

Safety: means that all employees can carry out their daily tasks without being exposed to danger. Some tasks involve some risk. To minimise this, there are a number of rules and safety instructions that must be followed by all.

Health: means that the focus is on the prevention of short and long term occupationally-related illnesses. No employee should be unnecessarily exposed to chemicals or harmful radiation at work.

Environment: relates to three important areas

- **Work environment:** Whether you work in the office, in production or on construction sites - it is important that your working conditions are good, things are kept clean and tidy, and you are not unnecessarily exposed to noise and dust.
- **Psychosocial work environment:** Everyone should be able to look forward to their work. We want our employees to enjoy working for us and to find a safe working environment. Bullying or harassment is unacceptable and will not be tolerated.
- **The external work environment:** Damage or contamination should be avoided. As much as possible will be recycled.

LCS Group of Companies:

The LCS group of companies includes LCS Holding GmbH and its subsidiaries LCS Cable Cranes GmbH, LCS Pipelines GmbH, LCS Cablecranes Ltd and LCS Cable Cranes Brasil Ltda.

Employees

Employees are all persons who are employed by the LCS group of companies: workers, employees, temporary staff and external assembly personnel.

Near-miss accidents:

Often there are uncertain conditions, unsafe actions, hidden dangers, risk potentials, weak points and behaviour which contravene the safety regulations, but are detected in time and therefore have no consequences. A dangerous incident at work occurs which almost causes an accident. Every near-miss accident is thus a warning signal. Proper accident prevention has been developed to avoid potential sources of danger actually causing accidents.



PART 1

CODE OF CONDUCT

3. SUBJECT AND SCOPE OF APPLICATION

The Code of Conduct is a directive which applies to all business activities of the LCS group of companies and sets **clear standards of behaviour**. It is binding on all employees who provide services on behalf of the LCS Group.

All persons are required to act:

- responsibly
- carefully
- honestly
- reliably
- with integrity

No employee may misuse his position in order to derive any personal benefit from it. Nor must he encourage or condone behaviour that violates this Code of Conduct. If a violation is observed, this is to be reported immediately to the supervisor or management



4. RESPECTFUL COEXISTENCE

Cooperation among employees, with customers, suppliers and other partners is characterised by

- **decency**
- **mutual respect**
- **fairness**
- **trust**
- **open communication**
- **honesty**

Violence, bullying, personal insults, sexual harassment or derogatory remarks about origin, skin colour, religion, disability, sexual orientation or marital status will **NOT** be tolerated.

All employees are treated equally in the LCS Group. Decisions regarding recruitment, training, remuneration and promotions are made solely on the basis of relevant qualifications such as education, experience, performance and other professional criteria.



5. BRIBERY & CORRUPTION

Gifts and other favours (invitations, etc.) may be **NOT** be offered to an authority, a customer, supplier or other business partner or accepted by them if they influence the

- business decision
- independence
- ability for objective decision making

Gifts and favours may be accepted or offered only if they are of low value, if this occurs rarely and if the time and place appear appropriate.

It is important to avoid decisions being influenced in any way.



6. CONFLICTS OF INTEREST

If the personal **interests of** an employee are in **contradiction** with the performance of his duties for the LCS Group, the employee is to inform his supervisor immediately. All employees are expected to make careful decisions and avoid situations that may lead to actual or apparent conflicts.

In particular, employees are prohibited from participating in or engaging with competitors, suppliers or customers. Exempted from this rule are investments in companies listed on the stock exchange.

There are ways and means to resolve conflicts of interest. It is important that these are addressed openly so that they can be dealt with appropriately.



7. PROTECTION OF BUSINESS SECRETS

All employees are required to **treat business information** relating to the LCS group of companies or its business partners as **confidential**. Business secrets may only be used to the extent necessary for production, project implementation or performance of work duties. Precautions are to be taken to prevent unintentional disclosure (e. g. do not store any confidential information on USB sticks that are taken to business appointments; handle data carriers with care, including outside the company).

In addition, all employees are prohibited from procuring business secrets of third parties by illegal means.

In the electronic exchange of information effective measures for the security of data and the protection of privacy must be taken.

Furthermore, employees are not allowed to publish photos and videos of construction sites, customers, suppliers and employees, especially on social media (Facebook, WhatsApp, Instagram and similar). Publication requires the prior approval of the management.



8. PROTECTION OF ASSETS

The LCS group of companies provides its employees with the equipment and assets required for carrying out their work, such as:

- buildings
- installations
- machines
- work equipment
- personal protective equipment
- work materials
- know-how

Employees are to **treat this equipment and other assets with care** and safeguard them from loss, theft or damage.

Property, plant and equipment and other assets of the LCS Group may in principle solely be used for business purposes. Private use is permitted only with written consent.



9. FAIR COMPETITION

The LCS Group is committed to **free, fair and open competition**. Anti-competitive price fixing with competitors or market sharing, as well as the abuse of a dominant market position, are not allowed.



10. MONEY LAUNDERING

The LCS group of companies supports the worldwide fight against **money laundering**. All employees must inform their supervisor or management if a business partner makes large payments in cash or if they notice any irregularities.



PART 2

MANUAL

FOR

SAFETY, HEALTH,

ENVIRONMENT

11. STRONG & SAFE

For the LCS Group the health and protection of all employees, the environment and product quality are the top priority. Safe, conscious and quality-oriented work requires cooperation and inspiration from all employees. Together we can achieve more than alone.

OUR QUALITY AND SAFETY PRINCIPLES

Essential elements of company policy are the following principles, which are always to be followed:

- Compliance with and monitoring of legal requirements and our own SHE guidelines as well as those prescribed by the customer.
- Avoidance of accidents, in particular personal injury, damage to property and the environment, and ensuring the safety of third parties
- Consistent use of personal protective equipment
- Creation of specific risk assessments and action guidelines
- Strict compliance with the relevant national and international standards and guidelines (e. g. O.I.T.A.F. - International Organisation for the Cableway Sector)
- Processing of high-quality building materials and cooperation with selected partners and specialists
- Use of the latest technologies and calculation systems
- Motivating employees by using state-of-the-art systems and machinery
- Continuous improvement of safety, health and environmental protection as well as quality management

CONTINUOUS IMPROVEMENT PROCESS

In the spirit of enterprise, we strive for continuous improvement, especially in the following areas:

- accidents at work
- undesirable incidents
- absences due to illness
- choice of materials (especially hazardous substances) and products
- work processes
- waste management
- safety of machines

A USEFUL TOOL FOR EVERY DAY

This manual serves as a guide for all employees (including colleagues from external companies) who provide services for the LCS Group, in relation to safety, health and the environment. We want to provide an excellent workplace with zero accidents, near miss accidents or undesirable incidents. Your daily cooperation helps us get closer to that goal.

WATCH OUT! TAKE TWO STEPS BACK AND THINK BEFORE YOU ACT

It is never wrong to inform a senior person if you feel insecure in a work situation. It is never wrong to report an undesirable incident or dangerous behaviour. Only then can we take action and ensure safety.

**THANK YOU FOR BEING A COMMITTED, SAFETY-CONSCIOUS
EMPLOYEE AND COLLEAGUE!**

12. RESPONSIBILITY FOR HSE

Everyone is jointly concerned and responsible.

The company is responsible for providing a safe workplace for its employees. This requires the help of all employees. All employees must actively participate in actions and measures introduced to create a safe and healthy working environment.



13. NEW TO THE COMPANY?

If you are new to the company or start to work on a construction site, it is important that you obtain information from your team leader regarding the following points:

- Who is responsible? Who is the responsible person?
- Who is a First Aider?
- Who is the safety officer?
- How are health and safety at work organised?
- What are the risks at your workplace?
- What special SHE requirements are there for your workplace?
- Where is the First Aid kit?
- Where are the emergency exits?



14. DANGERS AT THE WORKPLACE

MACHINES / SPECIAL EQUIPMENT

Anyone who operates a machine or special equipment must have a valid **driving licence or permit**. It is also necessary that the employee has received training for the machine or special equipment. The corresponding **operating instructions** are available at the workplace and / or on the machine itself.



WORKING AT HEIGHT

When working **at heights of more than 2 metres**, in addition to safety shoes and helmet, a **safety harness** must also be worn. Every fitter has his own backpack with the necessary safety equipment. If the backpack is not complete or parts are damaged, this should be reported immediately to the supervisor. In addition, the fitter must immediately report to one of the safety officers if he has had an accident (fallen into the harness). Even if the harness seems undamaged after the event, it must be checked for its functional efficiency.

Basically, working at height may only be carried out if at least one other person is present.



LADDERS

Careless handling of ladders is one of the most common causes of accidents. Therefore, ladders must always be secured against slipping. Before use, check that the **stoppers** are present and undamaged. A damaged ladder must not be used.



HOT WORK

Hot work is carried out during construction, installation, assembly, disassembly, repair, maintenance and other work.

Hot work includes:

- welding
- cutting
- soldering
- grinding

These may only be carried out by persons who have corresponding **education and training**. In particular, the potential risks of explosions, the development of smoke and fumes, dust, blinding light, etc. are to be considered and all necessary precautions are to be taken to avoid the risk.



ELECTRICAL POWER TOOLS

The installation, modification or repair of power tools may only be performed by **professional personnel**.

- Never insert bare wires into a socket outlet
- Always use professional fuses
- Broken tools, faulty cables and sockets must be reported immediately to the electricians



HAZARDOUS SUBSTANCES

See next chapter.



15. HAZARDOUS SUBSTANCES

There are hazardous substances that are necessary for certain work stages at almost all workplaces in the company. For each substance there is a safety data sheet, which can be viewed in the blue folder at the respective workplace.

The substances may carry one of the following hazard labels:



Explosive



**Highly / Extremely
flammable**



Oxidising



**Compressed
gasses**



Toxic / Highly toxic



Harmful to health



**Dangerous to
health**



Corrosive



**Environmental
hazard**

If you use hazardous substances, please note the following rules:

- Use the appropriate personal protective equipment.
- Contact the supervisor if you have questions or doubts.
- Read the safety data sheet carefully before you use the substance.
- Dispose of empty substance containers according to the information on the safety data sheet.
- Store hazardous substances according to the information on the safety data sheet (take note of the prohibition of storing substances together).
- Always wash substances off your hands and skin before you eat, smoke, or use the toilet.
- Work clothes which have oil marks or are contaminated with other chemical substances must be cleaned immediately.



16. PERSONAL PROTECTIVE EQUIPMENT

Certain activities involve various risks (the dangers are listed in the workplace evaluation , which is stored in the blue folder at the respective workplace). To reduce the risk of injury, various personal protective equipment is provided. It is **ALWAYS OBLIGATORY** to use this when carrying out hazardous activities – regardless of whether it is stressful, cold, hot or uncool!



Safety shoes



Safety goggles



Hearing protection



Gloves



Face mask



Protective helmet



Protective suit



Respiratory mask



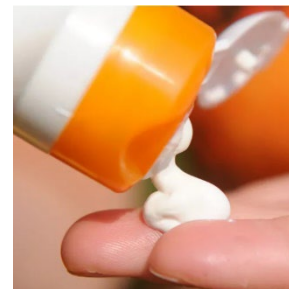
Safety harness



High visibility vest



Leather apron



Sunscreen



Workplaces with machines and construction sites harbour a multitude of dangers. Therefore the following **personal protective equipment** should be used:

- Safety shoes (ALWAYS)
- High-visibility vest (ALWAYS on the building site)
- Safety helmet (ALWAYS on the building site and when working on the test tower and at height)
- Protective goggles (when turning and milling, when working on running machines, during painting work)
- Ear protection (at a noise level above 80dB)
- Gloves (during painting and hot work, when working with sharp objects)
- Respiratory mask (for painting work)
- Protective suit (for painting work continuing for over 4 hours)
- Face mask (during welding work)
- Leather apron (during welding work)
- Safety harness (when working at a height of over 2 metres)

In addition to this equipment, employees on site are always to carry an **identity card**, which is to be visible at all times. If the employee does not follow these rules, the company will receive a warning or sanction from the customer.

The employee is first verbally cautioned, will receive a written warning in the event of another violation, and will be finally dismissed from the construction site.



17. CORRECT ACTIONS

- Use the appropriate personal protective equipment.
- Always keep emergency routes free. NEVER place pallets, material or tools in such a way that they block emergency exits.
- Before operating a crane, make sure that no person or object is in the vicinity and is endangered. When attaching loads, make sure they are properly attached before lifting.
- If you carry out repairs on a machine, **ALWAYS** turn it off. **NEVER** reach into a running machine.
- Before and during use of forklifts, make sure that no person or object is in the way and endangered.
- Put on gloves before you take hold of hot parts.
- **NEVER** reach into a running conveyor belt.
- Check a round sling for possible cracks and holes (also in the casing) before you take it into use. Do not use damaged round slings, but only CE marked slings.
- Before you go home, clean up your workplace: clear the tool and materials and throw any waste away.
- If you see a danger or an unsafe action, alert your colleagues **immediately**.
- **FOCUS ON YOUR WORK** - even if you have done the same thing a thousand times before.



18. ENVIRONMENTAL PROTECTION

It is the company's aim **to compromise the environment as little as possible**. An oil leak or a leak of another chemical substance should be removed immediately or treated appropriately and reported to management.

When working on construction sites we must in particular consider the local vegetation (plant formations and plant communities), cultural assets and fauna. Each construction site has its own requirements which must be observed.

Everyone can contribute to environmental protection if they observe the following rules:

- Waste should be avoided as far as possible.
- Recyclable waste, such as steel, paper, waste glass, plastic, must be disposed of separately. Observe the separation of waste!
- Special waste, such as spray cans, batteries, solvents, oil, etc., must be collected separately and handed over to an authorised disposal company.
- Noise-intensive machines may only be operated at the agreed times.
- Fuel may only be decanted at the designated locations.
- Packaging material should be avoided as far as possible or returned to the supplier.



19. TAKE THE INITIATIVE!

Your contribution is an important part of the overall picture.

- Take notice! Don't be indifferent to what is happening around you.
- If you see an action that can lead to a dangerous work situation: do something! Point out this to your colleagues.
- Actively participate in actions that are introduced. Give us your feedback if you have suggestions for improvement.
- It is your duty to inform the safety officers, supervisors and / or management about unsafe situations.
- Every undesirable incident should be reported. Only in this way can we take action and prevent this situation from recurring.
- Talk to the safety officers, supervisors and / or management if you have any questions about SHE.

We can learn and improve thanks to your initiative.



20. HSE CHECKS

PURPOSE

The recording of conditions in the workplace

AIM

To prevent accidents and eliminate dangerous conditions

METHOD

- Regular 6-S inspections (sorting, systematic arrangement, cleanliness, standards, effectiveness, safety)
- Continuous control of the use of personal protective equipment
- Annual workplace evaluations
- Keep safety data sheets for hazardous work substances up to date and comply with them (in particular prohibitions on storing substances together)

PARTICIPANTS:

- All employees
- Safety officers
- Environmental representative
- Safety representative



21. 6S

6-S serves as an instrument to make workplaces and their environment safe, clean and manageable. Order and cleanliness are prerequisites for improving work processes.

In this way, everyone can

- work more accurately (better quality)
- work more safely (lower risk)
- work more comfortably

THE 6S STAND FOR THE FOLLOWING POINTS

- **Sorting out** (removing unnecessary items)



- **Systematic arrangement** (objects are always kept in the same place, so they are always to hand)



- **Cleanliness** (The workplace is always to be kept clean)



- **Standards** (there are regulations / standards regarding cleanliness, sorting out and systematic ordering which must be followed, including checklists, floor markings, storage locations, storage specifications, etc.)



- **Effectiveness** (it is important to check whether the regulations / standards are effective, they must be enforced or possibly adjusted)



- **Safety** (Employees should use Personal Protective Equipment, be aware of workplace risks and the emergency plan; no objects should be left in the way, and there should be no trip hazards or dangers from objects hanging from above)



22. PREVENTIVE MEASURES

Regardless of whether you sit at a desk or do physical work, it is important that you vary your working posture as much as possible within a day.

Only you can take responsibility for that!

Take a critical look at your workplace. What could be better? Should items be arranged differently?

If you are sitting at the desk most of the time, get up now and again, move about and change your sitting position.

To prevent injury, correct body posture is incredibly important. Technical aids can only support this. You yourself have to pay attention as to how you sit, stand and lift, carry or pull objects. Make sure that you use lifting equipment correctly.



23. UNDESIRABLE INCIDENTS

The company aims to have **zero accidents, near-miss accidents and injuries**. To achieve this as far as possible it is important that any undesirable incidents are reported to the supervisor, management or the safety officers.

These include:

- Failure to use personal protective equipment
- Damage to property (e.g. broken windows or doors)
- Environmental damage / pollution (e.g. oil leak)
- Near-miss accidents
- Minor injuries or accidents that can be treated with First Aid
- Accidents at work that lead to hospitalisation / sick leave

Even if an incident may seem insignificant, it should nevertheless be reported in order to learn from mistakes. A lesson that is learned by all is better than 100 lessons that are learned by one person.



It is our intention to avoid accidents at all costs. We want to learn from everything that happens to prevent new incidents.

In order to guarantee a better and safer workplace we must be honest and willing **to learn from our mistakes and from those of others**. We cannot solve problems we do not know about. We may not be so lucky next time. This is a risk that we are not prepared to take.



24. EMERGENCY PLANNING

The following **emergency equipment** is to be provided in the company and on each building site:

- Emergency plan
- First Aid box (which should be checked regularly to ensure that the contents are complete and up-to-date)
- Fire extinguisher
- Marked emergency exits

RECOMMENDATION

If you come onto a building site you are unfamiliar with:

- Read the emergency plan
- Find out where the emergency exits are
- Ask where the emergency equipment is

In this way you will be better prepared for the situation should an incident occur.



25. CONDUCT IN AN EMERGENCY

In an emergency it is important to keep calm.

Breathe deeply.

When making an emergency call, the following information should be given:

- **WHO** am I?
- **WHAT** has happened?
- **WHERE** did it happen?
- **WHEN** did it happen?
- **HOW MANY** people are injured?

The emergency call centres are staffed by experienced professionals. Listen to them and answer their questions as calmly and clearly as possible. Tell them what you have done or are doing with the injured person.

A clear and correct message means that the emergency services can already prepare for the best possible treatment on the way to the scene of the accident.



26. COMMUNICATION

EXTERNALLY

If there is an undesirable incident at work, **talking to the media is not allowed**. Any communication with persons outside the company in relation to the accident / undesirable incident will be handled by management.

If a journalist, customer, supplier, or other person not belonging to the company asks you about an accident or undesirable incident, please contact management directly and inform your supervisor immediately.

INTERNALLY

If an event occurs where the rescue services are called, **management is to be informed** immediately so that they know about the incident and can deal with the situation in the best possible way.



27. DRUG AND ALCOHOL POLICY

Alcohol and drugs in the workplace are strictly prohibited. Both substances affect your behaviour and the quality of your work. The consumption of alcohol and drugs may, in particular, have negative consequences for safety, if you expose yourself or your colleagues to unnecessary risk, or cause damage to yourself or your colleagues.

NO EMPLOYEE MAY:

- Be under the influence of alcohol or drugs when coming to work
- Be in possession of drugs or alcohol at the workplace
- Consume alcohol or drugs at the workplace

All employees will be informed about the company's drug and alcohol policy. A violation of the rules will involve disciplinary measures (such as immediate dismissal from the building site or the dismissal of personnel who are under the influence of drugs or alcohol during working hours).

DRUGS INCLUDE:

- Heroin or other opiates
- Cannabis / marijuana
- Cocaine
- Ecstasy
- Amphetamines
- Hallucinogens
- Substances that are legal in themselves but may be abused, e.g. glue, solvents, etc.



MEDICINAL PRODUCTS may also impair behaviour and the quality of work, including, for example:

- Sedatives
- Antidepressants
- Sleeping pills
- Some antihistamines
- Various medicines for coughs, colds or stomach upsets

All employees are to inform their doctor about their professional activity in order to determine in advance whether a prescription drug will have a negative effect on the employee's behaviour. If the drug has side effects, the supervisor should be informed immediately.

If you suspect that a colleague is under the influence of alcohol or drugs, please inform management. Your concern shows only that you are thinking and taking responsibility.

All reports will be treated confidentially.



28. TAKE 2 STEPS BACK

In everything you do:

- Think before you act
- Consider others
- Follow instructions
- Take all the necessary safety precautions

Report all undesirable incidents to your supervisor, management and / or the safety officers.



29. YOU ARE IMPORTANT!

It is important that you report near-miss accidents and dangerous situations to your supervisor or to management. Only in this way can we improve the working environment and make it safer. Even if everything has turned out well this time and nothing has happened, next time the event may prove disastrous.

We want to prevent undesirable incidents as well as accidents and can do so with your help.

