

**CONSTRUCTOR GROUP ENVIRONMENTAL, SOCIAL, GOVERNANCE (ESG) Policy (Page 1/3)****Corporate Social Responsibility commitments**

CONSTRUCTOR GROUP regards sustainable development as a fundamental aspect of sound business management and Environmental, Social, Governance (ESG) considerations form an integral component of our business activities. We recognise responsible business decisions and actions as a key element of our strategy.

**Applicability**

This policy covers all operations of CONSTRUCTOR GROUP and its subsidiaries. The CEO is responsible for the implementation of this policy, yet the responsibility for our performance towards this policy rests with all employees throughout the company. Each local manager is responsible for ensuring that the principles set out in this policy are communicated to, understood and observed by all employees, and for ensuring compliance in their area of responsibility. Employees who reasonably suspect that there has been a breach of this policy must report it via the appropriate channels.

**Strategies and objectives**

CONSTRUCTOR GROUP's overall mission is to offer top-class products to its clients, whilst creating a rewarding and safe working environment for its employees. Being a multi-national company includes ensuring high environmental, social and governance (ESG) standards. The purpose of this policy is to outline CONSTRUCTOR GROUP's approach to responsible product production and distribution, including how CONSTRUCTOR GROUP works to capture and manage ESG issues in these processes. This commitment goes beyond compliance with rules and regulations and is intended to ensure that CONSTRUCTOR GROUP promotes a sustainable future for business, society and the environment. We shall encourage suppliers and contractors to adopt responsible business policies and practices

**Environment**

Targeting sound environmental practice, we promote:

- A commitment to making continuous improvement in the management of our environmental impact
- Environmental care, increased understanding of environmental issues and dissemination of good practice to our partners
- Compliance with relevant local and international environmental standards and legislation
- Energy efficiency and sound resource management
- Active monitoring and minimising of the environmental impact of our operations
- Product designs which minimise the environmental impact during their end of life disposal

**CONSTRUCTOR GROUP ENVIRONMENTAL, SOCIAL, GOVERNANCE (ESG) Policy (Page 2/3)****Social/Human rights**

With reference to labour and human rights practices, we expect and encourage:

- Safe and healthy working conditions
- Awareness and compliance with international conventions on human rights
- Avoidance of discrimination or harassment based on age, race, gender, religion, sexual orientation, disability, nationality, trade union activity or any other factor
- Respecting the employee's right to freedom of association and collective bargaining in accordance with local labor laws
- A clear 'zero tolerance' to child labour and slavery in our business operations worldwide; we do not tolerate slavery and child labour in our supply chain either
- Working hours which comply with industry guidelines and national standards, where they exist, and are not to be excessive
- Recruitment and career advancement based solely on individual merit
- A workplace environment in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company
- Our employees to realise their potential

**Governance**

In the context of the ESG perspective, we commit to and promote the following aspects of corporate governance:

- High standards of business ethics and integrity
- Zero tolerance of corruption and full compliance with applicable anti-bribery, anti-fraud, anti-money laundering and tax evasion laws and regulations
- Compliance with applicable anti-trust and competition laws
- Fostering economic and social wellbeing in the countries and communities in which we do business
- Respecting the legitimate interests of third parties with whom we have dealings in the course of our business
- Compliance with the laws and regulations applicable wherever we do business
- Compliance with the relevant principles governing data protection in each country in which we operate

**CONSTRUCTOR GROUP ENVIRONMENTAL, SOCIAL, GOVERNANCE (ESG) POLICY (Page 3/3)****Health & Safety**

- The safety of Constructor Group employees and customers is paramount; all industrial and office locations will have effective safety management systems
- Constructor Group will actively contribute to the development of technical standards within the Storage Equipment industry
- Constructor Group will only use suitably qualified installation sub-contractors
- Constructor Group will promote the benefits of safety inspections to our customers
- Constructor Group will make up-to-date product documentation available to our customers
- Constructor Group will respect all applicable product standards and legislation and maintain product liability insurance

**Constructor Group encourages our employees and business partners to report any failure by Constructor Group, its subsidiaries and employees, and to respect the above commitments.**

**ESG management and reporting**

This policy is issued by Frank Pohl (Group CEO) and is consistent with the **CONSTRUCTOR GROUP** commitment to sustainable development. Policy implementation will be overseen by Brian Howson (ESG Compliance Officer) and Simon Martinsen (CFO). ESG related issues are reviewed twice a year. The company's overall compliance with this policy shall annually be presented and discussed in a Board meeting.

**Issued by**

Name: Frank Pohl

Role: CEO Constructor Group

Date: 01.03.2016

Next policy review due: 23<sup>rd</sup> of June 2016