



GLOBAL STATEMENT OF POLICY

The intention of this Statement of Policy is to set out the tone of how we operate globally for the benefit of those interested in learning more about Capital Safety and for the benefit of our own employees.

As Capital Safety continues to grow it is particularly important to have a detailed set of principles and procedures as to how we do things for the benefit of both the longstanding CSG employees and those who have joined us more recently.

Attached, therefore, is a "Statement of Policy" for you all to read. You will see within this document that it refers to other policies and manuals already in place in your local companies, which inevitably are tailored to the national laws and customs in each of your countries. We believe this Statement represents the way that we are operating today, but it sets clear guidance for ways we can improve in the future.

The Statement is broken down into the following sections:

- 1) Introduction
- 2) How to read
- 3) Core Values
- 4) General Principles
- 5) Mandatory Directives
- 6) Notification of Violations
- 7) Acknowledgement of Compliance

If there is anything about these principles that you do not understand or if you want further information, please ask your line manager, your local Human Resources director, or the senior management in your business, or someone at Head Office.

It is important that we know that you've all received and understood this document; please could you therefore confirm that you have read it, and that you know of no unreported breaches of it.

Thank you for your help on this. Our customers depend on our products being made correctly, and the wider community increasingly values the way leading businesses such as ourselves conduct themselves. We therefore all benefit by upholding the highest standards.

Capital Safety Group
June 2011



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1. INTRODUCTION

Capital Safety is a dynamic and global fall protection company that has achieved tremendous growth through a solid foundation of innovation, quality, delivery, and focus on the needs of our customers in multiple industries. We are a company with a special responsibility to workers at height who put their lives in our hands every day and it is our goal at Capital Safety to bring those workers home safely every day wherever they work.

As Capital Safety continues to grow globally, it is important that our people do business according to a clearly articulated set of values and principles, and that we all apply a consistent approach to ethical and legal compliance issues as we seek to fulfill our global mission:

- ❖ To be recognized as the leading 'safety-at-height' company with a reputation for quality and innovation, setting the standard for the industry;
- ❖ To be recognized as providing best-in-class customer service, technical support and delivery, and to exceed our customers' expectations;
- ❖ To be partners with all our customers to identify their specific fall protection needs so as to provide a complete package of "safety-at-height" solutions;
- ❖ To develop our people and systems to allow us to grow while operating safely and acting responsibly towards our community and environment; and
- ❖ To take a leadership position with compliance entities, industry bodies, and user groups, working towards mitigating the risk of working at height and achieving a global increase in the use of effective fall protection equipment.

This "Global Statement of Policy" sets the tone for how we do business on a global basis to achieve our mission. The benefits of personal integrity, shared values, and consistently ethical and honest conduct in our daily business activities may appear obvious, but doing the right thing is not always easy.

This Statement is designed to assist all our employees in conducting themselves in a legal and ethical manner, and to provide a clear statement of the Company's position and expectations regarding corporate conduct and employee responsibility.

Our customers expect and rely upon the best from us. We should expect no less than the highest standards from ourselves.

Anders Petterson CEO
Capital Safety Group
June 2011





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2. HOW TO READ

This Statement of Policy identifies and communicates overall Capital Safety Group (“CSG” or “the Company”) policies regarding business conduct. It should be read and used in the context of CSG’s overall vision and direction, including the following documents:

- Strategic plan – where we are going
- Code of Conduct – how we will behave
- Financial manual – how we will pay for it
- Operations manual – how we will make it happen
- Local policies and handbooks – additional compliance

The objective is to secure full alignment at every level of CSG with the vision, direction, and conduct of our global business, as well as to minimise the health and safety impact of our operations on our own employees. This objective will be achieved by balancing our global business aspirations with local legal requirements and employee, customer and societal expectations.

You will find the following categories of information referenced in this Statement:

- Core Values – the values that drive our business
- General Principles – how we practice our core values every day
- General Directives – the compulsory instructions we all must follow
- Guidelines – the guidelines describing good practice for our business
- Reference materials – additional materials for reference

The Statement of Policy is not intended to provide an exhaustive discussion of every topic or applicable law. CSG has the right to amend its governing documents at any time.

All new employees will be provided with a copy of this Statement when they join, and it will be distributed to all current employees. The Statement and its associated documents are available on the Capital Safety intranets of each operating company. All employees are responsible for complying with this Statement and the procedures and practices we adopt that flow from it.

If there is anything about this Statement an employee does not understand, if an employee needs help in applying it or just wants further guidance, they are free to contact their immediate line manager, human resources representatives, business unit managing director, or someone at Capital Safety Head Office at +44 (0)1908 317 600.



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3. CORE VALUES

The primary rule of business conduct for CSG is that we do business legally and ethically in all aspects of our operations and in all parts of the world where we do business.

There are no exceptions to this rule.

It is our desire to be a respected corporate citizen in all aspects of our business, always committed to conducting our business honestly, ethically, and in accordance with all applicable laws.

CSG and its subsidiaries and affiliates depend not only upon the skills, abilities and commitment of all our employees, but also on our collective goodwill, judgment, self-discipline, common sense and integrity. We can only be successful if we are sensitive to the legitimate concerns of those dependent upon and affected by our activities, including customers, employees, suppliers, shareholders, competitors and the communities in which we do business.

Therefore we will:

- ❖ Pursue growth and earnings objectives while keeping the highest standards of ethical and legal compliance as guiding principles of our conduct;
- ❖ Compete fairly, honestly and aggressively within the boundaries established by applicable laws and ethical standards;
- ❖ Provide our customers with quality height safety solutions and services that are innovative and responsive to their needs;
- ❖ Provide an environment for our co-workers that respects diversity, fosters excellence, and helps CSG achieve competitive success in a global market;
- ❖ Act in an ethical manner as a responsive and responsible corporate citizen, and treat our suppliers and customers fairly, honestly, and respectfully.
- ❖ Work against corruption in all its forms

- ❖ Minimise the impact of our operations on the health and safety our own employees and on the environment in which we conduct our operations.



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4. GENERAL PRINCIPLES

These general principles outline how we practice our core values every day in the course of doing business. They are the foundation for our business conduct as set out more fully in the directives and supplemental guidance and reference sections of our governance documents.

Our people

Capital Safety employees innovative, pro-active, open and honest. We promote the strength that comes from diversity.

Capital Safety is committed to equality of opportunity in all its employment practices, procedures and policies. When we hire someone to work in our individual companies we choose the best candidate, irrespective of age, race, national origin, disability, religion, gender, sexual preference or membership/non-membership of any trades union. We apply the same standard when selecting suppliers and other people we do business with.

Capital Safety supports the United Nations Universal Declaration of Human Rights and will provide a safe and healthy workplace for employees with respect for their privacy and life outside work.

Our company

Capital Safety will grow both organically and by acquisition. When we acquire or set up new companies we ensure they and their employees understand and comply with our principles.

Capital Safety employees aim to avoid conflicts of interest between the company and themselves. We treat company property as if it was our own but we remember it's not. We make sure it is taken care of and is not used for personal purposes unless previously authorised.

Capital Safety employees do not compete with any activity or business of the company, either directly or indirectly, or use knowledge gained while working for Capital Safety to help anyone else compete with the company.

Our suppliers

We aim to develop long-term relationships with our suppliers and expect them to make a fair return on the investments they have made in doing business with us. We select them on objective criteria such as, quality, delivery, performance and price. We respect the patents, copyrights, trademarks and proprietary information of our suppliers, as well as the confidentiality of others with whom we do business.





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We also expect our suppliers to uphold standards of ethical conduct similar to what we expect of ourselves. Supplier compliance will be assessed using a survey similar to that shown in the reference section of the CSG Operations Manual. In particular Capital Safety will not use child or forced labour, nor tolerate working conditions or treatment that conflict with the International Labour Organisation's Core Labour Standards that cover the four main areas of forced labour, freedom of association, discrimination and child labour nor giving, requesting or accepting of bribes and facilitation payments.

We do not accept gifts or gratuities from present or potential suppliers, other than gifts of nominal value or reasonable hospitality given in the ordinary course of business.

Our products

Our products save lives. We will take extreme care in the design, testing and manufacturing phases to ensure they are safe and consistently reliable, as well as innovative and relevant to the needs of those customers.

They are designed to meet or exceed the requirements of the locally applicable standards in the countries in which they are sold. If we become aware of a set of conditions which, even though outside the scope of current standards, could potentially lead to a failure, we will act appropriately and work to improve our product to reflect that new knowledge. Where appropriate, we will use our membership of the relevant standards setting structures to have those standards reviewed and updated to best serve the safety needs of our customers.

Before launching products we will evaluate the designs against foreseeable usage conditions to ensure reliable operation and compliance with all currently applicable local standards relevant to that product. As standards are revised we will react appropriately to assess and update our product offering as necessary, addressing in particular those revisions that could impact the safety of our equipment users.

Our manufacturing facilities world-wide will operate within recognised (ISO 9001) quality standards regimes.

Our customers

When we advertise or solicit for business we are truthful in every detail concerning our products and services. We do not make misleading statements about offerings from our competitors. Customers will trust us because of our openness and expertise.

If our customers have a complaint, we take the complaint seriously and we follow it up diligently. We aim to always resolve any situations in a quick, friendly and professional way.





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Capital Safety and its employees will not pay or offer to pay bribes or illicit payments under any circumstances to customers, government officials or other parties in order to obtain or retain business, and we will not order or authorise someone else to make such payments. We will discontinue doing business with any person or entity if we become aware that such payments are expected or required as a basis for doing business.

Our shareholders

We comply with the relevant securities laws and we do not use company information that has not been made public for our own or others' benefit.

We take care to maintain our books and records so that they fairly reflect our business transactions as they occur. We do not make misleading or false entries or conceal or confuse our records in any way. We observe our internal control and financial policies as set down and safeguard Capital Safety Group information that is not in the public domain.

Our responsibility to our workers and to society

We comply with the laws and regulations of each country in which we do business. We always aim to compete fairly and honestly, observing all applicable anti-trust and competition laws. We are committed to supporting full compliance with local, regional, and national regulatory requirements at every location where we operate.

We continually explore new programs to ensure that we offer a safe work place for our employees, and, while we believe our operations have only limited environmental effect, we take steps to ensure that our environment also stays safe for current and future generations. In our manufacturing processes and day-to-day operations, we work to improve our health, safety and environmental management processes and performance, and promote the reduction, reuse and recycling of material at each of our manufacturing, administrative and training facilities worldwide.

Within the constraints of our economic environment, we support the giving of time and money to a variety of local and international charities involved in the reduction of work related injuries or in our local communities. At the discretion of the local management we will support causes for which employees have volunteered their time.

Capital Safety does not make donations to political parties, nor to any cause that might bring any part of the Group into disrepute.



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5. GENERAL DIRECTIVES

CSG employees must comply with the following Directives wherever applicable to individual job responsibilities and functions:

- Code of Business Conduct – separate document – see link _____
- Financial manual – separate document – see link _____
- Operations manual – separate document – see link _____
- Local policies / handbooks – separate documents – see link _____

6. NOTIFICATION OF VIOLATIONS

If you are aware, or become aware of any deviations from this Code, please contact your line manager, your local Human Resources director, or the senior management in your business, or someone at Head Office at +44 (0)1908 317 600.

If you have any concerns about the in-person notification procedures suggested above, please contact Expolink, the external service provider we have engaged, who will ensure that your comments are anonymously made available to the CSG Board.

Here are a number of Expolink’s no cost phone numbers:

Australia	1800 121 889
Canada	1888 268 5816
China	00800 3838 3000
France	0800 900240
Germany	0800 182 3246
Singapore	800 4411 140
Slovakia	0800 004461
Spain	900 944401
Sweden	0200 285415
United Kingdom	0800 374199
UAE (United Arab Emirates)	8000 44 138 73
USA	1877 533 5310

Please do not hesitate to make use of this service.

7. ACKNOWLEDGEMENT OF COMPLIANCE





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- ❖ I acknowledge I have received and read the CSG Statement of Policy and have voluntarily signed this Acknowledgment. I understand this document outlines CSG's expectations about employee responsibility to conduct business honestly, ethically and in accordance with Company policies and all applicable laws.
- ❖ I understand the importance of these policies and my obligation to conduct myself at all times in a legal and ethical manner in accordance with CSG policies. I will promptly report any possible violations in accordance with Company policy.
- ❖ I understand that, on occasion, the Company's policies may be changed or new policies may be established by the Company and that the Company has the right to make such changes.
- ❖ I will to the best of my knowledge and ability act with honesty and integrity and adhere to a high standard of ethical conduct, avoiding actual or apparent conflicts of interest in personal and professional relationships. I will report any material transaction or relationship that could be expected to give rise to such a conflict.
- ❖ I will act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or sacrificing my independent judgment.
- ❖ I will respect the confidentiality of information acquired in the course of my work and will not use such confidential information for personal advantage.
- ❖ I will responsibly use and control all business assets and resources employed or entrusted to me during the course of my employment.

Signature (Employee)

Printed Name (Employee)

Date: _____

Signature (CSG Representative)

Printed Name (CSG Representative)

Date: _____

