



26/03/2014

Subject: Algeco Scotsman Supplier Code of Conduct

Dear Supplier:

Algeco Scotsman and its affiliated businesses (which includes Ausco Modular Pty Ltd), have enjoyed working with exceptional suppliers and we recognize that suppliers are an integral part of our success. Algeco Scotsman and its affiliated businesses are committed to the highest standards of business conduct and we expect our suppliers to adhere to the same ethical standards.

In light of our commitment to ethical practices, we have formalized certain principles in our own Supplier Code of Conduct to ensure that our suppliers understand Algeco Scotsman's expectations of those businesses with which we have continuing supply relationships.

Algeco Scotsman expects that you will honor the ethical principles and practices set forth in the Supplier Code of Conduct and partner with us on issues involving business conduct. Attached you will find a copy of our Supplier Code of Conduct. All Algeco Scotsman policies are also available on-line at [www.algecoscotsm.com](http://www.algecoscotsm.com). Please take time to review this Code of Conduct within your organization. By continuing to conduct business with Algeco Scotsman you are confirming that you will comply with the Supplier Code of Conduct and with the laws, rules and regulations of each country in which you operate, including without limitation, those laws, rules and regulations related to labor, worker health, safety and the environment.

Thank you for your cooperation and as always, your partnership with Algeco Scotsman and its affiliates.

Best regards,

A handwritten signature in black ink, appearing to read 'Philippe Dulou', with a long horizontal stroke extending to the right.

Philippe Dulou  
Vice President  
Global Procurement and Supply Chain



## **Algeco Scotsman Supplier Code of Conduct**

### Overview

Algeco Scotsman and its affiliated, subsidiary businesses (“Algeco Scotsman”) such as Ausco Modular Pty Ltd are committed to the highest standards of business conduct. Algeco Scotsman bases its supplier relationships on lawful and fair practices and expects its suppliers to adhere to applicable legal and regulatory requirements in their business relationships. In order to ensure that our suppliers understand Algeco Scotsman’s commitment to ethical business conduct, we have prepared this Code of Conduct. Please review this Code of Conduct carefully with your employees, suppliers, agents and representatives. This code of conduct applies to all businesses that provide products or services for Algeco Scotsman and its subsidiaries, joint ventures, divisions or affiliates. Algeco Scotsman requires suppliers and their employees to commit to this code of conduct as a condition of doing business with no exception. Suppliers are expected to familiarize themselves and comply with Algeco Scotsman’s Code of Ethics available on-line at [www.algecoscotsman.com](http://www.algecoscotsman.com) and those policies of Algeco Scotsman’s affiliates in local jurisdictions. Suppliers should be aware that Algeco Scotsman’s individual operating units may have additional or more stringent policies. Suppliers are expected to comply with the policy requirements of any local Algeco Scotsman operating entity.

### Labor and Human Rights

#### *Prohibit the use of Child Labor*

Suppliers shall adhere to the minimum age limit defined by national law or regulation, and comply with relevant International Labor Organization (ILO) standards. Under no circumstances shall a supplier permit children to perform work that exposes them to undue physical risks that can harm physical, mental or emotional development or that improperly interferes with their education.



### *Prohibit all forms of Forced or compulsory Labor*

Suppliers shall maintain and promote fundamental human rights. Suppliers must not participate in human trafficking; use forced, involuntary, or slave labor; or purchase materials or services from companies using forced, involuntary, or slave labor. For suppliers based in or subject to the law of the People's Republic of China (PRC law), such human rights shall be determined pursuant to PRC law.

### *Compensation*

Suppliers shall ensure that working hours, wages, and benefits will be consistent with legal and industry standards, including those regulations pertaining to minimum wages, overtime, mandatory benefits and other elements of compensation.

### *Hiring and Employment Practices*

Suppliers' must comply with all applicable legal requirements of the jurisdiction in which they operate and applicable Algeco Scotsman policies which are available at [www.algecoscotsman.com](http://www.algecoscotsman.com).

### *Harassment*

Algeco Scotsman's suppliers must comply with the laws, rules, regulations and Algeco Scotsman policies of the locations in which they operate. Suppliers are expected to be familiar with the business practices of their suppliers and subcontractors, and ensure they operate according to this code of conduct. Algeco Scotsman may discontinue its relationship with suppliers who fail to comply with this code.

### *Health and Safety*

Suppliers must provide workers with a safe and healthy work environment. Suppliers should take proactive measures that support accident prevention and minimize health risk exposure.

### Environment

Suppliers are expected to conduct their operations in a way that minimizes the impact on natural resources and protects the environment, customers, and employees. Suppliers must ensure their operations comply with all laws of the country of origin related to air emissions, water discharges, toxic substances, and hazardous waste disposal.



## Ethics and Compliance

### *Gifts and Gratuities*

Suppliers should refer to and comply with Algeco Scotsman's Gift and Entertainment policy available at [www.algecoscotsman.com](http://www.algecoscotsman.com) and those policies of the local Algeco Scotsman entity for which Suppliers are transacting business.

### *Improper Payments*

Suppliers must comply with the provisions of the Foreign Corrupt Practices Act (FCPA), UK Bribery Act and other similar legislation. Bribes, kickbacks, similar payments or offers of anything of value are strictly prohibited. This ban applies even when local laws may permit such activity. Employees, suppliers, and agents acting on behalf of Algeco Scotsman are strictly prohibited from offering or accepting such considerations under any circumstances.

### *Conflict of Interest*

Suppliers shall avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest while engaged in business with Algeco Scotsman. Suppliers shall not enter into any transactions with Algeco Scotsman employees which could potentially create a conflict of interest. Suppliers are required to immediately report any situations of potential or apparent conflicts between their interests and the interests of Algeco Scotsman.

### *Confidential Information*

Proper management of confidential information is critical to the success of both Algeco Scotsman and its suppliers. Confidential information includes all nonpublic information that might be useful to competitors or harmful to Algeco Scotsman or our customers if disclosed. While performing work for Algeco Scotsman, suppliers may have access to proprietary and/or confidential information. Suppliers are required to maintain the confidentiality of such information entrusted to it and to protect all Algeco Scotsman information, electronic data, intellectual property, design and technologies with appropriate safe-guards using the same care that the supplier exercises with its own proprietary and confidential information. Suppliers shall not disclose such information to any other person without the advance written consent of Algeco Scotsman, unless such disclosure is legally mandated. Any transfer of confidential information must be executed in a way that secures and protects the intellectual property rights of Algeco Scotsman and its suppliers.



Suppliers may receive Algeco Scotsman confidential information only as authorized by a non-disclosure agreement and must comply with their obligations to not use the information except as permitted by the agreement, and to protect the information from misuse or unauthorized disclosure. Suppliers must respect the intellectual property of Algeco Scotsman and shall not use Algeco Scotsman or its affiliates' or subsidiaries' trademark, images, patented technology or other materials, including materials of third parties, unless explicitly authorized by Algeco Scotsman in writing. If a supplier becomes aware of an actual or possible unauthorized disclosure of Algeco Scotsman information, it must be reported immediately to Algeco Scotsman's Legal Department.

#### *State and trade secrets*

Suppliers may not, directly or indirectly, wrongfully solicit, obtain or use on behalf of Algeco Scotsman, or wrongfully disclose to Algeco Scotsman, any information of any other person, association, firm, corporation, government or other entity, which is secret, confidential, proprietary, classified for national security or national interest purposes, or government procurement sensitive (e.g., source selection information) or any other information which may offer Algeco Scotsman an illegal or unfair advantage.

#### *Accurate Accounting Records*

Suppliers shall maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices. Suppliers shall accurately document all transactions related to their transactions with Algeco Scotsman.

#### *Antitrust and Competition Laws*

Many countries, including the United States, United Kingdom, the European Union and China have laws and regulations, usually referred to as antitrust or competition laws that prohibit unlawful restraint of trade and anti-competitive behavior. Algeco Scotsman is committed to observing such laws and requires its Suppliers to comply with these laws at all times.

#### *Contractual compliance*

Suppliers shall not breach or violate any of its existing agreements, including without limitation employment agreements, consulting agreements, non-disclosure agreements and technology licenses, if such breach could give rise to a claim at law against Algeco Scotsman.



### News Media Inquiries

Suppliers must not represent themselves to the media as speaking on behalf of Algeco Scotsman, unless expressly authorized in writing to do so. Suppliers shall immediately refer any media inquiries to the Algeco Scotsman Vice President of Strategic Planning.

### Communication

Suppliers are expected to assist Algeco Scotsman in enforcing this Supplier Code of Conduct by communicating its principles to their supervisors, employees, agents and suppliers.

### Non-compliance Reporting

The standards of conduct described herein are critical to the ongoing success of Algeco Scotsman's relationship with its suppliers. Any supplier may direct questions or comments about this code of conduct to the General Counsel or Vice President of Procurement at Algeco Scotsman.

Violations of the Algeco Supplier Code of Conduct can be reported confidentially by calling the applicable telephone number set forth below:



**ALGECO  
SCOTSMAN™**



## TELEPHONE

## International Toll Free Number

### Country

Austria	0800-291870
Australia	1-800-339276
Belgium	0800-77004
Brazil	0800-8911667
Canada	1-855-247-3142
China - Northern	10-800-712-1239
China - Southern	10-800-120-1239
Czech Republic	800-142-550
Denmark	80-882809
Finland	0800-1-14945
France	0800-902500
Germany	0800-1016582
Hungary	06-800-17199
Italy	800-786907
Luxembourg	800-2-1157
Mexico	001-800-840-7907
Netherlands	0800-0226174
New Zealand	0800-447737
Poland	0-0-800-1211571
Portugal	8008-12499
Romania	0808-03-4288
Russia	8-10-8002-6053011
Slovakia	0800-001-544
Slovenia	503-619-1885
Spain	900-991498
Sweden	020-79-8729
Switzerland	0800-562907
Ukraine	00-11-866-384-4277
United Kingdom	0800-032-8483
United States	1-855-247-3142