

SIGI

Code of Conduct

SOUTHWORTH INTERNATIONAL GROUP, INC.



Table of Contents

1. Letter from our CEO	3
2. Why we have a Code of Conduct.....	4
3. Reporting Hotline.....	4
4. Our Mission, Vision and Core Values.....	5
Customer Focus	
Collaboration	
Commitment	
Commercial	
Community	
5. Our Commitment to a Fair and Safe Workplace.....	6
6. Environmental Stewardship.....	7
7. Anti-Bribery and Anti-Corruption.....	7
Statement of Policy	
Permissible gifts, meals and entertainment, and travel or other expense reimbursement	
8. Export Control Compliance.....	8
9. Data Privacy	8
10. Cyber-Security.....	9
11. Intellectual Property	9
12. Company Website Links	10



1. Letter from Our CEO

Southworth International Group, Inc. and our subsidiary companies build products and provide services that make work faster, safer and easier and life better for thousands of people around the world. This has been our mission and our focus since 1890. And at no time has our mission been more relevant than during the COVID-19 pandemic, when supply chains have been under unprecedented strain.

Our Company has many assets, both physical and intangible. Of all of these, without a doubt the most important are our Core Values and our reputation, which guide and reflect the way we do business. We conduct our business with the highest ethical standards and in strict compliance with applicable laws and regulations. This has been our way of doing business for more than 130 years.

Our Code of Conduct outlines the key policies and guidelines that define and reinforce our commitment to doing business the right way. It is a critical document. Please take the time to read and understand it. If anything is unclear, please ask. If after reading this document, you or someone around you has a question about proper conduct in general or in a specific situation, please ask. Ask your manager, access our Compliance Hotline via email, telephone or postal mail or contact our senior leadership team directly. We will address your concerns promptly and professionally. I assure you that retaliation for reporting improper or potentially improper conduct is not acceptable and will not be tolerated in our Company.

Our Company is committed to doing business the right way, wherever we are doing business. Thank you for taking the time to read and understand our Code of Conduct, and thank you for staying true to our Core Values and for maintaining the highest ethical standards in all that you do. This is our way of doing business and it defines who we are as a Company.

Yours sincerely,

James E. Cabot



2. Why We Have a Code of Conduct

Southworth International Group, Inc., Vertical Positioning Group and their subsidiary companies (together “SIGI”) believe that the manner in which we conduct business is as important as the business that we do. Operating with integrity and the highest ethical standards provides a strong foundation for success for SIGI. Our Code of Conduct reinforces our values by providing a framework of ethical standards within which all employees must operate. This document should be used as a reference guide for all employees in conducting our business in an ethical and appropriate manner.

Every employee of SIGI has an obligation to read and understand our Code of Conduct. Our Code is intended to be read in conjunction with regional employee handbooks and is not intended to interfere with or limit the rights that employees have under local laws. If a local custom, culture or law sets a different standard than what is described in the Code then you should speak to your local Human Resources Department for guidance.

3. Reporting Hotline

If you know of, or have any reason to suspect, any conduct which is in violation of applicable laws, company policy or our Code of Conduct you have a responsibility to share your concern. You may speak with your manager, your Human Resources manager or place an anonymous report through our Ethics and Compliance Hotline.

SIGI prohibits any threats or acts of retaliation against any personnel who in good faith seeks advice, raises a question or concern, makes a report or assists the company in identifying or investigating actual misconduct or violation of company policy or of any anti-corruption law. Any such retaliatory conduct will not be tolerated and is subject to disciplinary action up to and including immediate termination. Any person who believes that he or she has been subjected to any threats or acts of retaliation should report that concern immediately.

There are 3 ways to file an anonymous report:

1. **Online:** Visit www.RedFlagReporting.com/Southworth
2. **Call:**
 1. USA Toll-Free: 1 (888) 580-8160
 2. USA (Toll): 1-916-915-9466
 3. China National: 400 120 0197
 4. Sweden Toll-Free: +46 20-075 35 05

*Push 1-English, 2-Spanish, 3-Mandarin, 4-Swedish
3. You may also use the following (be sure to be detail oriented, provide our organization’s name, and indicate if you wish to be anonymous our not):
 1. **Fax** to 1-330-572-8146 (USA Number)
 2. **Email** to redflag@redflagreporting.com
 3. **Mail** to RFR, P.O. Box 4230, Akron, Ohio 44321, USA



4. Our Mission, Vision and Core Values

Our Mission

We make the toughest material handling work faster, safer and easier by creating customized vertical work positioning solutions and services designed to improve productivity and safety.

Our Vision

Our vision is to be the global leader in the design, development, manufacture, distribution and support of solutions and services to make material handling safer and more productive. We work closely with our customers to create and deliver innovative and customized solutions to their most challenging material handling problems. And we conduct business at a level of value and service that causes channel partners and end users to prefer our brands to all others. In fulfilling our vision, we are creating a better future for each of our stakeholders: our customers, our employees and our shareholders, as well as for the communities in which we do business.

Our Core Values

Customer Focus

Our success depends on our customers' success. We support, educate and provide our customers with the quality and service they need, and we strive to exceed their expectations

Collaboration

We embrace a spirit of collaboration and teamwork with our fellow colleagues, customers and suppliers. We seek to help each other to be successful, recognizing each other's knowledge and appreciating the power of diversity. We invest in and develop talent. We care for one another as a team

Commitment

We are proud of our legacy and have a passion for safety and ergonomics. As individuals, we take initiative, learn from our mistakes and are focused on continuous improvement. As a group, we work toward clear objectives and expect great results

Commercial

We are developing our business for the long-term, every day. We are professional, business-minded and believe in an entrepreneurial spirit that allows us to take calculated risks and create profitability through increased customer value. We recognize and celebrate success, because success enables new opportunities

Community

We are building community based on honesty, transparency and trust. Trust is established by respecting and caring for each other, being straightforward and providing clear and constructive feedback. We listen actively to understand each other's intentions and are honest and trustworthy in our relationships. As we seek to build a strong company community, we also seek to be an asset to the many communities in which our company does business. Mindful of our wider impact on those around us, we use the company's, and the world's, resources wisely



5. Our Commitment to a Fair and Safe Workplace

Southworth International Group, Inc. is committed to respecting human rights. We have established certain standards designed to protect human rights and expect our suppliers and business partners to follow these standards.

Protect against child labor

We do not employ child labor, even if it is permitted by local law, and we refuse to do business with any supplier that does.

Protect against forced labor and abuse of labor

We prohibit the use of enslaved, forced or indentured labor and have zero tolerance regarding trafficking in persons.

Prohibit harassment

We are committed to providing a workplace that is free from harassment and disrespectful conduct. We will not tolerate actions or words (including jokes) that are based on personal characteristics and which create an intimidating, hostile or offensive work environment.

Prohibit discrimination

We are committed to ensuring an equitable workplace where each employee can reach his or her full potential regardless of cultural background, gender, gender identity or expression, sexual orientation, marital status, military status, race, color, national origin, ethnicity, religion, creed, age or disability.

Comply with work hour, wage and benefit laws

We provide pay and benefits that meet or exceed the legal requirements of the countries and sub-national jurisdictions where we do business.

Provide a safe and healthy workplace

We seek to prevent accidents, injuries and occupational illnesses. We promote healthy and safe lifestyles for all employees and their families through Regional Wellness Programs.

Demonstrate good corporate citizenship

We support the communities in which we live and work. We strive to improve the quality of life in these communities through support for education, community development and other locally relevant initiatives. Our employees are active in our communities in volunteering and community service.

6. Environmental Stewardship

Southworth International Group, Inc. complies with all applicable environmental laws, regulations, and standards and works to minimize any adverse impact on the environment. We endeavor to conserve natural resources and energy, and to reduce or eliminate the use of hazardous substances and we recycle scrap. We recognize that Environmental Stewardship is an important global issue.

- We are committed to understanding and measuring our environmental impact and to developing sustainable ways of doing business
- We take measures to ensure that our operations do not harm the environment or quality of life in our communities

7. Anti-Bribery and Anti-Corruption

Southworth International Group, Inc. is committed to upholding the highest professional and ethical standards and to complying with the anti-bribery and anti-corruption laws of all of the countries in which we do business.

SIGI prohibits our personnel and anyone else acting on our behalf from paying, giving, offering or promising any bribe, kickback or other corrupt payment of anything of value to any person with the intent to improperly influence the obtaining or retaining of business or to gain an improper business advantage for ourselves or our customers. SIGI personnel may not make such payments themselves, and may not authorize, direct or permit others, including agents, consultants or other representatives, to make such payments on the Companies' behalf.

SIGI prohibits our personnel and anyone else acting on our behalf from receiving, or directing the receipt of, any bribe, kickback or other corrupt payment of anything of value to any person with the intent to improperly influence the obtaining or retaining of SIGI business or to gain an improper business advantage.

Permissible gifts, meals and entertainment, and travel or other expense reimbursement

A small gift or token of esteem or gratitude is often an appropriate way to display respect for a customer, customer representative or service provider. Any such gifts or tokens of esteem or gratitude must have a good faith business or promotional purpose and must be of modest value.

Any provision of meals and entertainment, or reimbursement of travel or hotel expenses, must be a good faith expenditure with a legitimate business purpose, related directly to the promotion, demonstration or explanation of our services, or to the performance of a project for a customer. Any such expenditure must be lawful under local law and US law, must be reasonable in value, must be approved in accordance with the Companies' Travel Policy and Expense Guidelines where applicable, and must be documented accurately and completely.

8. Export Control Compliance

It is the express policy of Southworth International Group, Inc. to comply with all export control and sanctions laws and regulations of the countries in which we do business, as well as with relevant American, British, Swedish and European Union laws and regulations. This policy applies to all directors, officers, employees and third-party contractors of all SIGI departments and subsidiaries. SIGI is committed to ensuring that all transactions undertaken by anyone operating on behalf of SIGI, including third parties, are in compliance with applicable export control and sanctions laws.

This policy requires the following:

- All employees and contractors must fully understand how export control and sanctions laws apply to the work that they do, participate fully in all compliance training, report any potential compliance issues to the appropriate compliance personnel, maintain accurate records, and ask questions if they are uncertain as to what requirements, including American, British, Swedish and European Union restrictions, might apply.
- SIGI does not engage in any business with parties that are sanctioned by the United States or other governments of other countries in which we are domiciled.

9. Data Privacy

Southworth International Group, Inc. is dedicated to ensuring that all personal information relating to its employees, contractors, service providers, customers and vendors is secure and follows all rules and regulations set forth by the countries in which we conduct business including General Data Protection Regulation (“GDPR”) or equivalent country level regulations.

SIGI collects personal information for different purposes:

- Comply with our obligations to you as a customer
- Enable general customer care and customer service
- Facilitate payments for services provided
- Provide information and targeted marketing
- Prevent Fraud and Risk Management
- Follow applicable legislation, such as denied party screening

Personal information will only be stored if it is necessary to fulfill the purposes for which the data was collected.



10. Cyber-Security

Each of us has a shared responsibility for protecting our workplaces, data and operations from unauthorized access and use. SIGI deploys many technical solutions to keep our environment safe, but we all play a role in keeping SIGI secure.

Be a Human Firewall:

- Stay current on all required cybersecurity employee training and exercise the skills learned.
- Create and use strong passwords and keep them confidential
- Remain vigilant about potential unauthorized access to our physical locations.
- Remain vigilant of social engineering phone calls or emails. Validate abnormal requests before acting, including clicking links in emails or sharing information verbally or through email.
- Be suspicious of strange email requests. Think before you click; do not open any links within an email but rather report suspicious emails using the Phish Alert button in Outlook.
- Report any actual or suspected loss, theft, or improper use of or access to IT systems or information to IT.
- Promote SIGI information security current best practices and standards amongst colleagues, vendors, and customers.

11. Intellectual Property

Southworth International Group, Inc. is committed to a high level of legal and ethical standards in the conduct of our business. It is the policy of SIGI to compete fairly in the marketplace. This commitment to fairness includes respecting the intellectual property rights of our suppliers, customers, business partners, competitors and others, including original equipment manufacturers and other independent service organizations. No company employee, independent contractor, or agent should steal or misuse the intellectual property rights owned or maintained by another.

In addition, SIGI is committed to protecting its own intellectual property, such as information, processes, engineering drawings and technology, from infringement by others. It is the responsibility of every SIGI employee to help protect SIGI intellectual property. It is the responsibility of SIGI managers and supervisors to foster and maintain awareness of the importance of protecting SIGI's intellectual property.



12. Company Website Links

Please see links below for Corporate, and all subsidiary, websites which will provide access to global and regional policies.

Americas

[Southworth International Group, Inc.](#)

[Southworth Products](#)

[Presto Lifts ECOA](#)

[Lift Company of America](#)

[Southworth de Mexico](#)

EMEA

[Marco](#)

[Hymo](#)

[Jihab Sales AB](#)

APAC

[Southworth](#)

[Marco](#)