



# ETHICS CHARTER

# SUMMARY

• Message from the President .....	Page 2
• Group's Principles of Action .....	Page 3
• Principles of Individual Conduct .....	Page 8

## MANITOU Group Ethics Charter

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MANITOU decided to introduce an Ethics Charter as an expression of its values, deployed at all levels of the organization and in any activities.

Designed as a reference framework for conducting both our internal and external activities with integrity, responsibility and in a socially responsible way, this Ethics Charter sets out:

- the principles of action that MANITOU wishes to establish for itself as a legal entity and for all its employees,
- the principles of individual behaviors that employees must pledge to observe.

The principles set out in this charter are not exhaustive but appeal to each individual's sense of responsibility and common sense. Approved by the Group's controlling bodies, they establish the essential rules of conduct and ethics applicable to all staff across all levels and that the Group wishes to share with its financial, industrial and commercial partners.

I request all managers and employees to actively implement and promote these principles in the daily conduct of their activities.

## **GROUP'S PRINCIPLES OF ACTION**

### ***Observing the laws and basic texts***

The MANITOU Group undertakes to strictly observe all the laws and regulations to which it is subject in each country in which it operates, whether at a national or international level. In this respect, it will ensure that each of its entities and/or employees also observes the laws related to their work, workplace and environment.

In addition, the MANITOU Group will comply with the fundamental principles set forth in the following treaties:

- the Human Rights Charter;
- the main agreements of the International Labor Organization;
- the main OECD directives aimed at multinational companies;
- the United Nations Global Compact.

In particular, the Group strongly rejects all kinds of active or passive and public or private corruption and subornation in its financial, industrial and commercial activities, as well as all forced or compulsory labor and child labor.

This charter's principles add to these laws, regulations and basic texts but do not replace them. For possible Group operations not subject to such laws, regulations and obligations, they constitute the bases of fairness and honesty that must govern their performance. Each employee is required to understand and apply these principles in all circumstances.

### ***Observing the principles of integrity in regard to third parties***

The quality and sustainability of relationships with third parties depends on honesty and integrity, which are implemented in a sustainable manner by all of the Group's employees. The Group's business must be conducted observing the best industry practices and in the interests of the Group's customers, partners and shareholders.

#### *Customers*

The Group ensures that its customers are treated honestly and fairly whatever their line of business and company size. It guarantees the quality and safety of its products and services. It undertakes not to knowingly give a false image of the latter in its advertising, press releases, contracts and any other documents for external use, and to constantly improve them according to customer expectations and by conducting suitable research programs.

#### *Suppliers and industrial partners*

The Group builds balanced relationships with its suppliers, sub-contractors and industrial partners in order to enter into agreements that all parties observe. It undertakes to select its suppliers on the basis of an objective assessment of their products, prices and services. It guarantees to treat them respectfully, impartially and fairly, both in terms of method of consultation and market allocation decisions.

The Group will also ensure that such suppliers and partners undertake to abide by principles of a similar nature to this Charter.

#### *Competitors*

In regard to its competitors, the Group intends to act in a spirit of fair and open competition. It drives its business dynamically but fairly. In particular, it will refrain from any price fixing with competitors, production or sales quotas and any illegal practice seeking to limit competition. It will inform itself about its competitors in an appropriate manner: public communications and documents, trade fairs, sector surveys and consultants acting in accordance with honest practices.

#### *Shareholders / Investors*

The Group will make every attempt to provide its shareholders with the profitability expected from their investment and guarantee to provide them with accurate, full and regular information. It therefore scrupulously observes the accounting and market regulations and faithfully sets out its transactions in its accounts.

The corporate governance methods for Group companies fall under explicit operating rules. Separation between management and controlling is one of the Group's main organizational principles and applies to all its entities.

Any information that may affect the market value of MANITOU securities is subject to strict rules governing distribution and use. The Group ensures that insiders holding such information undertake not to disclose it and only operate share movements after such information has been published, according to the AMF ("Autorité des Marchés Financiers") directives. Each employee or third party concerned is informed that any breach of these rules could give rise to civil and penal sanctions.

#### *Representatives of national authorities*

The Group respects the sovereignty of States. It does not intervene either in the operation or financing of public or political works. It may make donations from time to time to charity works or patronage schemes, within the limit of the current delegations of power. In particular, it ensures that none of its activities can appear to amount to preferential support for a political party or any other influential group.

It nonetheless reserves the right to express its positions to local authorities in regard to issues that concern its activities, employees and shareholders and on ethical and business conduct matters, notably regarding respect for human rights.

#### ***Protecting health and safety***

The Group has established an active policy for protecting health and safety in regard to its employees, customers and other stakeholders. It ensures that this policy is constantly

applied and regularly assesses its efficiency.

The Group provides its employees, whatever their duties and the risks to which they are exposed, with a healthy and safe environment in accordance with the law. In turn, it requires that they strictly observe the regulations in force on each site and requests the same vigilance from sub-contractors working in its facilities.

Consuming intoxicating or illegal substances or substances that cause behavioral problems is prohibited at work or on the company premises. The only exception to this rule relates to smoking and alcohol consumption in the locations and at the times authorized, in accordance with local rules and regulations.

The Group's responsibility in the area of health and safety also covers customers and product users, as well as all third parties involved in the direct environment of the products.

This environment is potentially dangerous (work sites, warehouses, agricultural facilities...) and the user and operator manuals, safe working loads and other information made available to users must be strictly applied when using these machines. The MANITOU Group implements the resources required to ensure safety, at the design and industrialization phase through suitable qualification testing, and downstream by providing its customers with all the required information.

In addition, the Group attaches a particular importance to health and safety training, both for employees and customers. Suitable training programs are run across all its sites and for sales and technical staff in its distribution networks.

Finally, the Group ensures from the project phase that its industrial investments take health and safety criteria into account for the employees concerned and the surrounding populations.

### ***Respecting employee rights***

The Group's Human Resources policy is based on mutual respect, fairness and cultural diversity. Recruitment, training, promotion, mobility and other work-related decisions depend on each person's competencies, talents and professional motivations, according to the Group's requirements. The latter entails a particular vigilance with regard to gender equality in recruitment and the employment of disabled workers.

It is the Group's responsibility to guarantee a working environment free from all kinds of discrimination (notably racial, sexual, political, religious, cultural or trade union), hostility or harassment. The Group ensures that this kind of attitude, which, depending on the country, may be the object of heavy disciplinary and/penal sanctions, is prohibited.

The Group strictly respects the confidentiality of personal data both for its protection and use, in accordance with the laws and regulations in force.

The Group associates its employees with the life of the company by promoting access to information, freedom of association and expression and an active social dialogue with staff representatives.

The Group offers its employees, throughout their careers and whatever their category, the possibility of accessing information on the evolution of their skill and on-going training adapted to develop their abilities.

### ***Respecting the environment***

The MANITOU Group makes respect for the environment a primary criterion of its industrial decisions. It implements a management and on-going enhancement policy for its facilities, within the scope of the environmental protection laws and regulations.

From the design of its products and throughout their life cycle, MANITOU respects the environmental performance standards in force, both in regard to the materials used and the behavior and impact of the products when used.



## **PRINCIPLES OF INDIVIDUAL CONDUCT**

### ***Professional commitment / loyalty to the Group***

Employees of the MANITOU Group are bound to implement their professional competencies to the highest possible level and to actively contribute to observing this charter. In particular, they undertake to respect the delegations of power and decision to which they may be signatories.

All situations that may benefit employees or one of their close relatives, or that may compromise the objectivity of employees in their decisions or actions to the detriment of the Group, constitute a conflict of interests. Each employee that may be confronted with such a situation must in any case act with the highest integrity.

Notably, employees maintaining direct or indirect relationships with the Group's customers or suppliers must strictly observe the contracts entered into and the applicable law and regulations. In addition, they undertake that:

- no benefits or favors whatever may be requested, for themselves or third parties, in exchange for actions or decisions coming within its prerogatives;
- gifts and invitations received remain within acceptable limits in regard to uses and anti-corruption legislations, and under no circumstances may cash donations be accepted.

Possible employee engagement in public or political activities is a strictly personal matter. These activities must be conducted outside the professional arena (timetables, premises, materials, etc), at the expense of the employee concerned and must under no circumstances involve the image and name of the Group.

### ***Use of the Group's assets***

Protecting the Group's assets is crucial for the business. Employees must do everything possible to protect these assets, to only use them for business purposes for the sole benefit of the Group and to refrain from using them for an illegal purpose or one that is contrary to this charter.

#### *Protecting assets*

The Group's assets may be material or tangible (premises, work tools, furniture, items in storage, financial securities, patents, etc.). They also include all of the information protected by industrial or trade secret (designs, know-how, etc).

Employees undertake never to claim ownership of assets at their disposal and to use them with all the care required to protect them.

#### *Use of assets for private purposes*

Employees undertake not to use any of the Group's assets or privileged information they may hold through performing their duties for personal purposes, either directly or indirectly.

The IT and communications resources in particular (e-mail, telephones, IT network, internet / intranet access) are meant for business purposes. A reasonable level of use for private purposes may be accepted provided the applicable laws and regulations are observed.

Similarly, the Group purchases a defined number of software usage licenses related to user requirements. It is strictly forbidden to make copies.

The Group's IT Charter defines this IT resources usage framework in greater detail.

### *Protection of information*

Information, whether of a technical, commercial, economic, legal or other nature, that is confidential or for internal use, protected or not by virtue of industrial property or industrial secret rights, may be critical for the development of the Group and its strategy, and must therefore be protected.

All Group employees are strictly forbidden to disclose orally, in writing or digitally, all or part of these elements to third parties or other employees not authorized to hold such information, except through the delegation or express authorization of their managers.

- Employees undertake to carry out all the actions required to protect the security and confidentiality of information available to them.
- All statements to the press and external consultants or analysts and all public statements may only be made by duly authorized people and in conjunction with the competent departments (Communication, Finance Department, Human Resources, Legal Department, etc).

Employees are also personally responsible for the documents they draw up and the information they provide. They must ensure that such information:

- is correct, full and accurate,
- is circulated normally, to ensure the proper performance of the Group's activities, always observing the approval and disclosure rules in force,
- is correctly filed.

Notably, documents and information properly identified as being confidential are only distributed to identified persons or groups of persons, who will refrain from modifying them or conveying them without the formal agreement of the issuer.

These obligations remain binding even after employees leave the Group.

### *Protecting the Group's image*

The Group's image is another precious asset that everyone must undertake to protect. All employees empowered to represent the Group to third parties (customers, suppliers,

media, etc) must act professionally, strictly observing their duty of secrecy in order not to compromise this image. They must also ensure that the information is well shared and understood by all.

By extension, these principles of professionalism and secrecy apply to all Group employees in daily life (transport, residence, external assignments, open spaces, etc).