

Anticorruption Code of Conduct

31/10/2023

MANITOU
GROUP

SET THE WORLD
IN MOTION

Message from our CEO

Manitou Group provides innovative machines and solutions worldwide to improve working conditions, safety and performance of our customers. This leading role in the material handling, people elevation and compact equipment sectors entails a responsibility to conduct our activities, both internally and externally, with integrity and accountability.

In this context, the Board of Directors and Executive Committee of Manitou Group have decided to adopt an Anticorruption Code of Conduct in order to express their convictions on this subject and to share them with the Group's employees and all third parties with whom Manitou Group works.

This Code sets out guidelines that must be applied by all Manitou Group employees, regardless of the Group company that employs them, their hierarchical level, their place of work or their nationality.

This Code reflects Manitou Group's ambition to promote its fundamental rules of integrity in the implementation of its strategic priorities.

I count on you to ensure that the rules set out in this Code are applied to ensure the safe development of our business.

These rules are not optional and must be applied by each and every one of us.



No Manitou Group employee will be penalised for refusing to participate in a bribery scheme even if such refusal could result in the loss of a business opportunity.

While certain situations may not be explicitly covered by the Anticorruption Code of Conduct, it is up to each employee to discuss such situations with his or her line manager or the Group Compliance Department. This approach will always be supported and encouraged, as it contributes to our Group's reputation and helps to develop our culture of integrity, loyalty and trust.

Michel DENIS
President & CEO

SUMMARY



01

02

03

04

**Scope of
application**

**What is
corruption?**

**Rules of
conduct**

Implementation

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Scope of application



Scope of application

The Anticorruption Code of Conduct, an extension of the Code of Ethics, applies to each and every one of us, employees, managers and directors of Manitou Group, regardless of the entity to which we belong. Each employee must behave in an exemplary manner and refrain from doing anything contrary to the rules of conduct defined in this Code. Each employee must also be vigilant regarding the application of these rules by his or her professional environment, both internal and external.

Employees should address any questions regarding the application or interpretation of the Code to their line manager or to the Group Compliance Department (compliance@manitou-group.com).

Manitou Group's business partners are expected to comply with this Anticorruption Code of Conduct when doing business with Manitou Group.

What is expected of leaders and managers

- Lead by example in applying the rules of conduct set out in this Code;
- Promote this Code to members of their teams;
- Ensure that all members of their teams comply with the provisions of this Code and the related procedures and policies;
- Create a positive environment in which compliance issues can be discussed within their teams;
- Promote a compliance culture within Manitou Group.

What is expected of employees

- Read this Code and the related procedures and policies;
- Comply with the provisions of this Code and the laws applicable to them;
- Discuss or report any compliance issues that come to their attention with their line manager or the Compliance Department.



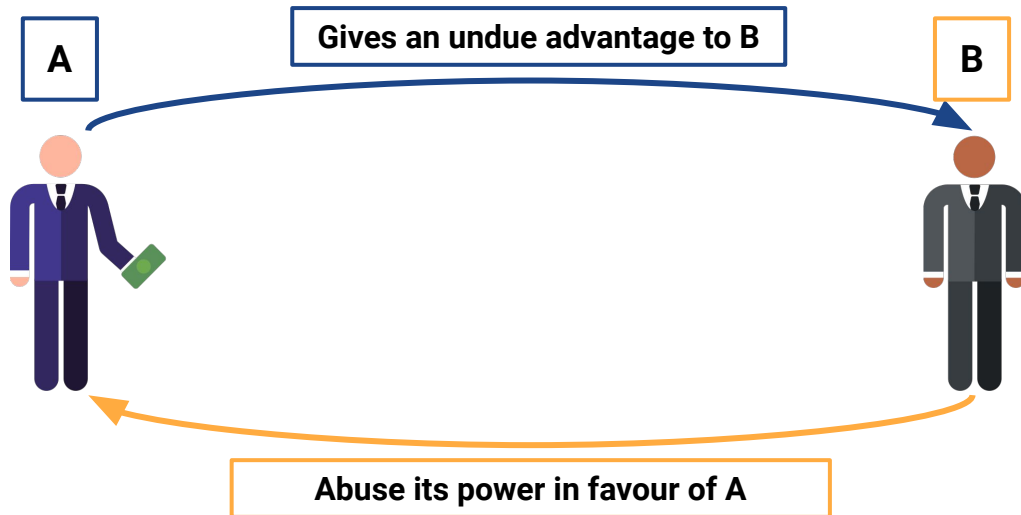
**What is
corruption?**

What is corruption?

What is corruption?

Corruption is the act of requesting or accepting an undue advantage in order to perform or refrain from performing an act within the scope of one's duties.

Corruption is the abuse of entrusted power for personal gain.



Corruption can be:

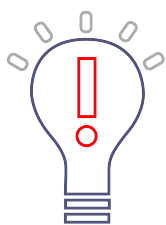
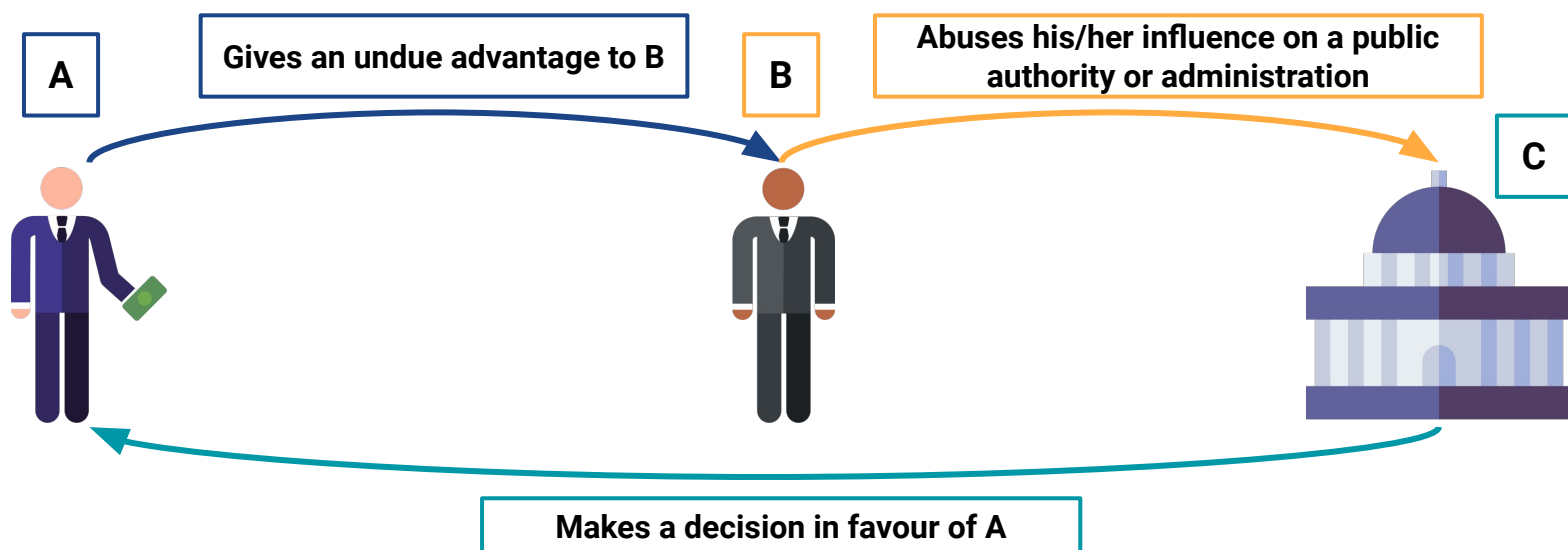
- » Active or passive:
 - » Active bribery is a situation in which a person (the briber) offers or gives an undue advantage in order to obtain a decision favourable to his or her interests (Character A above);
 - » Passive bribery is a situation in which a person (the bribe-taker) asks for or accepts an undue advantage in order to abuse his or her power (Character B above);
- » Directe or indirecte:
 - » Direct bribery is a situation in which the briber directly offers or gives an undue advantage to the bribe-taker without the involvement of an intermediary;
 - » Indirect bribery is a situation in which the briber offers or gives an undue advantage to the bribe-taker through the intervention of an intermediary;
- » Public or private:
 - » Public corruption is a situation in which the bribe-taker and/or the briber is a public person (e.g. elected official, civil servant, etc.);
 - » Private corruption is a situation in which both the bribe giver and the bribe taker are private individuals.

What is influence peddling?

What is influence peddling?

Influence peddling is an offence similar to corruption. The difference between the two offences is that:

- In a corruption scheme, the bribe-taker **abuses his/her public or private duties**;
- In an influence peddling scheme, the bribe-taker **abuses his/her influence on a public decision**.



The undue advantage can take many forms in a corruption scheme:

- Cash;
- Excessive gifts and/or invitations;
- Payment of expenses (e.g. education of children);
- Excessive commission paid to an intermediary;
- Recruitment of a close relative;
- Donation to charity;
- Highly advantageous investment.

What is corruption?



The consequences of corruption

On society and citizens



- » Corruption diverts funds intended for essential services for citizens, reducing their access to healthcare, education, drinking water, etc.;
- » It deprives governments of tax revenues, leading to higher taxes on companies and individuals and reduced public spending;
- » It funds the operations of criminal organisations, thereby supporting crimes such as human trafficking and human rights abuses;
- » It undermines democracy and the rule of law by perverting public decisions that are not made in the public interest when the public official is corrupt.

On the economy



- » Corruption costs the economy at least 2% of global GDP every year, according to the IMF and the World Economic Forum;
- » It distorts free competition and reduces the efficiency of the economy;
- » It stifles innovation;
- » It slows down investment and reduces its effectiveness.

What is corruption?



The benefits of anticorruption compliance


Beyond mere regulatory compliance, anticorruption compliance is an essential strategic asset for the long-term success of Manitou Group.

Indeed, **our compliance culture at Manitou Group:**

- » **Protects our profitability** because, at constant prices, corruption erodes sales margins and increases operating costs;
- » **Is a competitive advantage and a guarantee of trust for our business partners:** More and more business partners prefer to work with companies that have a compliance programme because it is a guarantee of trust and reliability. Compliance thus leads to greater customer loyalty and an improvement in our brand image and reputation, all of which give Manitou Group a competitive edge and contribute to increased sales and growth for the Group;
- » **Strengthens our employer brand:** Our culture of compliance enhances our ability to retain talent and attract future talent. When a company has a culture of compliance, its employees are more loyal, motivated, productive and committed to the company's success;
- » **Provides confidence to our investors:** With the rise of non-financial ratings, the existence of a culture of compliance means cheaper access to the financial markets;
- » **Protects Manitou Group and its employees:** Compliance allows us to proactively manage the risks of corruption and to detect illegal behaviour at an early stage so that protective measures can be taken to mitigate its impact and avoid serious legal and financial consequences. Our compliance culture therefore minimises the potential disruption to our business operations and financial performance;
- » **Protects and enhances Manitou Group's reputation and brand image:** Our reputation is one of our most valuable assets. A company's reputation takes decades to build and can be destroyed in a matter of days by a corruption scandal. Our culture of compliance enables us to protect ourselves from the severe repercussions that such an attack on the Group's reputation would have on the Group's financial health.

The benefits of compliance for Manitou Group



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Rules of conduct

Rules of conduct

Compliance with the law



Manitou Group complies with the laws and regulations of the countries in which it operates. The Group complies with the principles of the OECD and UN anticorruption conventions and all relevant laws in force in the countries in which it operates.

As a consequence, Manitou Group employees must not:

- Offer, promise or authorise the payment of a sum of money or any other undue advantage, whether material or immaterial, to a public or private person with a view to obtaining an advantage for Manitou Group (e.g. obtaining or retaining a contract, speeding up the completion of administrative formalities, etc.);
- Demanding or accepting a sum of money or any other undue advantage, whether material or immaterial, from any public or private person with the aim of influencing a decision by abusing the power entrusted to them;
- Using intermediaries (e.g. agents, consultants, advisers, etc.) with the aim of committing acts of corruption indirectly through these intermediaries.

These rules apply in all countries, regardless of local practices.

Risk factors



While corruption can occur in many professional situations, certain risk factors are likely to increase the likelihood of such an act occurring. These risk factors have been identified through Manitou Group's corruption risk map.

In order to protect Manitou Group and its employees, the following pages address each of these risk factors in detail, illustrating them in light of the Group's activities along with the rules of conduct to be followed so that everyone can adopt the appropriate behaviour to protect themselves and Manitou Group.

Sanctions



Any violation of the rules set forth in this Anticorruption Code of Conduct may have serious consequences for Manitou Group's reputation and business.

As a result, in the event of proven violation of this Code, Manitou Group may take disciplinary action against the offending employee, up to and including dismissal.

In addition, in the most serious cases, Manitou Group may initiate civil and criminal proceedings.

Rules of conduct



Facilitation payments

Definition

Facilitation payments are unofficial payments (as opposed to legitimate and official duties and taxes) made to facilitate, expedite or guarantee an administrative formality to which an individual or company is normally entitled free of charge, such as customs clearance for goods and/or persons, obtaining permits or visas, etc.

Principles and rules

Such payments are tantamount- to corruption and are therefore strictly prohibited by Manitou Group in all countries.

However, in situations where the refusal to pay could threaten an employee's physical integrity, health or freedom, the employee does not voluntarily choose to pay in order to facilitate an administrative formality, it is a matter of escaping threats of coercion; consequently, he or she must pay. Manitou Group protects its employees throughout the world and requests that this type of illegal practice, which constitutes extortion, be reported immediately.

Case study



- » **Situation:** Machines have been awaiting customs clearance in the destination country for several weeks and the customer is getting impatient. I contact the local customs authorities to find out the reasons for the delay and to obtain an estimated date for customs clearance. The customs officer tells me that he can give priority to the Manitou machines in exchange for \$50.
- » **What to do:** I am facing a facilitation payment. My safety, health and freedom are not at risk. I must therefore refuse to pay and wait for the machines to be legally cleared. I report the demand to my manager and/or through the internal whistleblowing system.

Rules of conduct



Conflict of interest

Definition

A conflict of interest situation is any situation in which an employee's personal interests (family, financial, etc.) may conflict with those of Manitou Group.

A conflict of interest situation may therefore influence or appear to influence the impartial exercise of the employee's duties and responsibilities, in particular his or her ability to make a decision in a loyal and independent manner and in the interest of the Group.

Principles and rules

A conflict of interest situation is not in itself a reprehensible situation. However, when such a situation arises, the implementation of certain precautions must be taken to protect the employee concerned and to safeguard the interests of Manitou Group.

As soon as we are hired and throughout the performance of our duties within the Group, each of us must continuously identify any potential conflicts of interest, particularly in the event of a change in our personal or professional situation.

As soon as an employee becomes aware of a situation involving a conflict of interest, he or she must promptly and formally disclose it to his or her line manager and/or the Group Compliance Department. Disclosing a conflict of interest, through a formalized declaration, protects the employee concerned and is an absolute obligation as part of our duty of loyalty to the Group.

The management of a conflict of interest situation is the responsibility of the line manager, who will seek an appropriate solution to resolve the conflict, if necessary with the support of the Group Compliance Department.

Case study



- » **Situation:** Manitou Group has an outsourcing need that my former employer, with whom I am still in contact, could meet. I've been asked by a colleague if I know any service providers who could meet this need.
- » **What to do:** I can certainly suggest that my former employer be consulted, but I must do so in a neutral manner, disclosing my relationship with that company in a formalised way and refraining from interfering in any way with the expression of need and the awarding of the contract.



Did you know?

Manitou Group has a [conflict of interest management policy \(GRP-PO-CP-019\)](#). A digital declaration form is available to employees on the [Audit, Risks and Compliance Department \(ARC\) intranet](#).

Rules of conduct



Gifts & Hospitality

Definitions

A gift is any item, payment, gratuity, service, benefit, or other advantage (financial or otherwise), whether given or received.

Hospitality is any form of social event, entertainment (sporting or cultural event, holiday, etc.), trip, seminar, accommodation or meal, whether given or received.

Principles and rules

Giving or receiving gifts and hospitality is a common way of fostering good business relationships.

However, the giving and receiving of gifts and hospitality can also amount to, or be perceived as, active or passive corruption.

Therefore, to remain legal, these practices must not in any way seek to influence, or give the appearance of influencing, a decision.

Consequently, no gift or hospitality may be offered with the intention of obtaining an advantage of any kind whatsoever or influencing the recipient's professional decision.

Similarly, no gift or hospitality received may be accepted if it might suggest that the giver might receive favourable or preferential treatment in return.

As a result, gifts and hospitality offered and received must be:

- Reasonable in terms of value (they should be simple tokens of courtesy) and frequency (once or twice a year per recipient and giver);
- Transparent: offering or receiving gifts and hospitality at home is prohibited. Related expenses must be accounted for in accordance with applicable laws and accounting standards;
- Reciprocal: reciprocity is a key element in assessing whether gifts and hospitality offered or received are appropriate;
- Made outside strategic business periods: it is strictly forbidden to offer or receive gifts and/or hospitality during these periods (3 months before and after such a period: tendering process, before and immediately after signing or renewing a contract, etc.);
- Made in a professional context: hospitality offered or received in a professional context must have a direct link to the Group's activities (e.g. business meeting organised on the occasion of a cultural or sporting event);
- Validated where appropriate: they must be validated by the appropriate person depending on their value.

Rules of conduct



Gifts & Hospitality

Case study



- » **Situation:** During a competitive tender for a maintenance service contract, I receive a parcel at home from the current contract holder containing a case of wine, accompanied by the following note: "To thank you for our fruitful collaboration in the past and in the future, we are pleased to offer you these bottles of wine to enjoy with your family and friends".
- » **What to do:** I cannot accept this gift for two reasons:
 - » 1: I am in a strategic business period with this service provider;
 - » 2: I received this gift at home, so it is not made in a transparent way and it could be interpreted as an attempt to conceal it.

Case study



- » **Situation:** During the end-of-year festivities, a supplier delivers a box of chocolates to my office.
- » **What to do:** I can accept this gift of symbolic value.

Case study



- » **Situation:** A potential customer has issued a call for tenders for the purchase of 100 telescopic forklift trucks. During the sales negotiations, the customer suggests that I meet him for lunch to discuss his technical requirements in person, so that I can make a suitable proposal.
- » **What to do:** I can have lunch with this client, but we're in a strategic business period, so I won't be able to pay for his meal. Everyone will have to pay their own share.



Did you know?

Manitou Group has a [gifts and hospitality policy \(GRP-IN-CP-002\)](#) which details the rules for offering and receiving gifts and hospitality.

Rules of conduct



Patronage and sponsoring

Definitions

Patronage is a donation to an activity of general interest for philanthropic purposes, and is therefore non-commercial in nature. Donations can take the form of money, in-kind contributions (donation of products) or skills.

Sponsoring is a commercially motivated action in the form of funding for a social, cultural or sporting event in exchange for visibility for the Group or one of its brands.

Principles and rules

Patronage and sponsoring actions must be carried out without seeking to influence, or appearing to influence, any of the Group's business partners or public decision-makers. Nor may these actions grant, directly or indirectly, a personal advantage to the employee from whom the request for funding originates.

These actions are authorised provided that:

- They are authorised by local laws;
- They have been validated in advance by the appropriate body (e.g. Selection Committee for patronage actions) after an analysis of their relevance and an assessment of the integrity of their beneficiary;
- They are governed by a specific signed agreement;
- The amounts granted are not paid in cash or to a natural person;
- They are duly recorded in the accounts;
- They are monitored, at least annually, and supported by reports.

Case study



- » **Situation:** During a call for tenders, the manager of a large local rental company offers Manitou Group an exclusivity contract if the Group agrees to sponsor the local football club of which he is chairman. He explains that this sponsoring would enable the football club to modernise its equipment and that Manitou would benefit from publicity that would boost the Group's image.
- » **What to do:** As this sponsoring action is a prerequisite for obtaining the exclusivity contract, I am faced with a corrupt request. I must therefore refuse to sponsor the football club and report the request to my line manager and through the Group's whistleblowing system.



Did you know?

Manitou Group has a [sponsorship policy \(GRP-PO-SR-002\)](#) describing the eligibility criteria and the selection and monitoring process for funded projects.

Rules of conduct



Relations with business partners

Definition

Manitou Group's business partners include its suppliers, service providers, dealers, customers, agents, intermediaries, JV partners and industrial partners.

Principles and rules

Manitou Group is committed to building business relationships based on trust, transparency, professionalism and mutual benefit. As such, Manitou Group wishes to work only with business partners who share its standards of integrity.

In order to ensure that its relationships with its partners are in line with its own standards of integrity, Manitou Group has adopted the following measures:

- Assessing the integrity of business partners in accordance with the Group's third party assessment procedure;
- Communicating Manitou Group's integrity standards, by communicating the Code of Ethics, this Anticorruption Code of Conduct and/or the Responsible Purchasing Charter and asking them to comply with them;
- Including anticorruption clauses in commercial contracts, allowing for the termination of contracts in the event of a breach of integrity.



Did you know?

Manitou Group has a [procedure for evaluating its business partners \(GRP-PR-CP-007\)](#). This assessment must be carried out at the start of the business relationship and repeated periodically.

Rules of conduct



Intermediaries

Definition

An intermediary, or agent, is any third party mandated to act in the name and on behalf of Manitou Group or one of its subsidiaries towards public officials or private individuals or companies.

The notion of intermediary can take several forms: business agent, lobbyist, customs agent, real estate agent, lawyer, etc.

Principles and rules

Manitou Group may be prosecuted for acts committed by its intermediaries, even without its knowledge. In order to protect Manitou Group, the use of an intermediary must be secured by the following measures:

- The integrity of each potential intermediary must be assessed in accordance with the Group's procedure for assessing third parties. Their expertise, references and ability to carry out the assignment entrusted to them must also be assessed;
- Any use of an intermediary must be the subject of a contract formally validated by the Legal Department. The contract must include an anticorruption clause and the intermediary must contractually undertake to comply with Manitou Group's Anticorruption Code of Conduct;
- Compensation must be in line with market practices and commensurate with the services provided;
- Detailed records of the services provided by each intermediary must be subject to appropriate controls to ensure the reality of the service and the adequacy of the remuneration;
- Payment to an intermediary must be validated by the financial controller of the region or division after validation of the reality of the service provided. Payment must be made in a country where the intermediary is established or incorporated. Payments to tax havens are prohibited.

Case study



- » **Situation:** The army has just issued a call for tenders for the purchase of 10 electric MRTs. A member of the tender committee assures me that Manitou Group will win the contract if it uses the services of an engineering company with links to the Ministry of Defence.
- » **What to do:** This situation is risky because a public official is suggesting that I use a third-party company to win a contract. In addition, the relationship between the engineering company and the Ministry of Defence could conceal corrupt links. I therefore request an assessment of the integrity of this engineering company and seek written confirmation from this official before going any further.



Did you know?

Manitou Group has an [Agent procedure \(GRP-PR-CP-010\)](#) dedicated to intermediaries. It details the checks that must be carried out when using an intermediary.

Rules of conduct



Lobbying

Definition

Lobbying is any oral or written communication with a public official to influence legislation, public policy or administrative decisions.

A lobbying activity may be carried out directly by an employee or corporate officer of Manitou Group or indirectly by third party acting in the name and on behalf of Manitou Group (e.g. professional organisation, service provider mandated by Manitou Group, etc.).

Principles and rules

In its lobbying activities, Manitou Group respects the following principles:

- **Compliance:** All lobbying activities carried out on behalf of Manitou Group comply with the applicable legal frameworks and the codes of conduct of institutions and authorities;
- **Integrity:** These activities must comply with the internal ethical standards;
- **Transparency:** Anyone meeting with a public official on behalf of the Group must disclose their identity and their position within Manitou Group;
- **Sincerity:** Information and arguments communicated during lobbying activities must be reliable, verifiable, objective, complete, up-to-date, relevant and sourced;
- **Political neutrality:** No contribution of any kind whatsoever to a political organisation or party is authorised, including in countries where such contributions are permitted.

Case study



- » **Situation:** Manitou Group is invited by a group of French lawmakers to share its industrial experience during a workshop on a bill to boost the country's industrialisation. At the end of the meeting, several members of parliament ask me if it would be possible for them to visit the Group's French production sites.
- » **What to do:** I can invite them, but I must be careful not to promise to pay for their transport, accommodation and/or meals as this could be illegal and perceived as a corrupt attempt. Therefore, I check the applicable laws and the rules specific to this legislative body. If in doubt, I discuss the matter with my line manager or the Compliance Department.



Did you know?

Manitou Group has a [Lobbying Policy \(GRP-PO-CP-031\)](#) which details the Group's principles in this area.

Rules of conduct



Accounting records and internal control

Principles and rules

The fairness and reliability of the financial statements are a fundamental condition for the proper management of Manitou Group. Accordingly, the accounting records and books must accurately and faithfully reflect the transactions carried out and the financial documents must give a true and fair view of the situation of the Group's entities.

The traceability of the recording of the various actions and payments must be sufficiently precise to demonstrate their legitimacy and to avoid the appearance of concealing acts of corruption or influence peddling.

As a result, all employees who make accounting entries must demonstrate precision and rigour, comply with accounting rules and ensure the existence of supporting documentation for these entries.

All employees must be honest when preparing invoices, expense claims and other documents giving rise to accounting entries.

No transaction, asset, liability or other financial information may be concealed from Manitou Group's management, Board of Directors or internal and external auditors.



Implementation

Implementation



Dealing with a risky situation

Adopting the right behaviour

The basic principle is to **never stay alone when faced with questions or a risky situation**.

If you have the slightest doubt about the interpretation of the rules in this Code or their application to particular situations you are faced with:

- Don't stay on your own and **don't act in haste or under pressure**: take a step back and talk to your colleagues, your line manager and/or the Compliance Department, who are there to advise you and help you identify and deal with risky situations;
- Ask yourself the following questions:
 - Are laws and regulations complied with?
 - Is it in line with the Code and the company's interests?
 - Is it free from personal interest?
 - Would I be embarrassed if my decision were made public?

Dealing with corrupt requests

In the event of a request from a third party that is incompatible with the rules defined in this Code, you must systematically refuse the request, on the grounds that the internal rules of Manitou Group prevent you from accepting it. The only exception to this rule concerns situations in which not paying would threaten your physical integrity, health or freedom.

If the person insists:

- Explain that the request exposes both of you to sanctions;
- Ask for an explanation of the request;
- Indicate that you will need to speak to your manager about this and contact your line manager;
- Ask to speak to the person's manager;
- Ask for the request to be made in writing;
- Indicate that you will have to disclose the incident to the local embassy/consulate;
- Ask for proof of payment;
- Report the request via the Group's whistleblowing system.

Implementation



Whistleblowing system

Whistleblowing system and online platform

Acts of corruption and violations of compliance procedures and policies are harmful not only to Manitou Group, but also to its employees. Therefore, when an employee is confronted with a suspected or proven violation of the rules set forth in this Anticorruption Code of Conduct, he or she must inform his or her line manager or the Ethics Committee as soon as possible using the Group's whistleblowing system.

This whistleblowing system has its own secure online platform that is accessible to employees and all stakeholders of the Group. This platform also provides toll-free telephone numbers for direct contact with an operator. This tool is available 24 hours a day, 7 days a week, 365 days a year. This platform allows you to report a concern anonymously wherever possible and in strict confidentiality in all cases.

This online platform is available at the following address:
<http://www.manitou-group.ethicspoint.com/>

All reports will be handled diligently, impartially and with the utmost care, while respecting the requirements of confidentiality, the rights of the defence and the protection of personal data.

The Manitou Group is committed to ensuring that no whistleblower is discriminated against or retaliated against for making a report in good faith. However, a report made in bad faith may result in disciplinary action.



Did you know?

Manitou Group has an [Alert Procedure \(GRP-IN-CP-001\)](#) which describes the steps for the handling of reports.

Implementation



Dedicated organisation

The Board of Directors, the Chief Executive Officer and the Executive Committee of Manitou Group have decided to set up an organisation dedicated to defining and implementing the anticorruption compliance system within Manitou Group. This dedicated organisation consists of three components:

Audit Committee

The Audit Committee is a body of the Board of Directors. It is composed of Directors who pay particular attention to compliance issues. Several times a year, the Vice President Audit, Risk and Compliance reports to the Committee on the work of the Compliance Department and the activities of the Ethics Committee.

Ethics Committee

Manitou Group Ethics Committee is responsible for ensuring the proper application of the Group's fundamental principles, as set out in the Code of Ethics and the Group's reference framework, including the Anticorruption Code of Conduct.

One of the Ethics Committee's duties is to receive and deal with reports received through the internal whistleblowing system.

The members of the Ethics Committee are appointed on the recommendation of the Chief Executive Officer and the Corporate Secretary, with the approval of the Chairman of the Audit Committee, for a term of three years, renewable without limit.

Compliance Department

Manitou Group has set up a Compliance Department that reports to the Audit, Risks and Compliance Department within the Corporate Secretary.

The Compliance Department is responsible for defining and implementing the anticorruption compliance system in all Group entities.

Implementation



Procedures, policies and training

Anticorruption compliance procedures and policies

The Anticorruption Code of Conduct is available on the Group's intranet and on the [Group's corporate website](#). It is also communicated to all employees when they take up their duties. In addition, the Anticorruption Code of Conduct is adopted by the Boards of Directors of all Manitou Group entities.

The rules of conduct set forth in the Anticorruption Code of Conduct are supplemented by specific procedures and policies that describe in detail the rules and processes to be followed for each of the risk factors addressed in this Code.

These procedures and policies are regularly updated to reflect changes in the regulatory and Group context.

They are available to all employees on the [Group procedures intranet page](#) and on the [Audit, Risks and Compliance \(ARC\) Department intranet site](#).

Anticorruption training

The Compliance Department has developed a comprehensive anticorruption compliance training programme. This training programme, which is tailored to each employee's risk profile, provides an understanding of the issues surrounding corruption, the risks involved and the behaviours that should be adopted to protect oneself.

This compulsory training programme includes:

- E-learning modules. The first awareness-raising module must be completed within three months of joining Manitou Group;
- A face-to-face session for employees most exposed to the risk of corruption.