

MANITOU GROUP CODE OF ETHICS

MANITOU
GROUP

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FOREWORD

A worldwide reference in handling, access platforms, and earth moving equipment, the Manitou group's mission is to improve working conditions, safety, and performance around the world, while protecting people and their environment.

Guided by its values of **reliability, commitment and passion**, the Manitou group must continue to adapt to a constantly changing world. This is a great challenge about which we must be **passionate**. At all times and in all places, this individual and collective **commitment** is our strength and forms the foundation on which all our actions must be built in accordance with the law and ethical rules. Board members and directors, who are the first guarantors of compliance with this commitment, have a duty to set an example.

In addition to mandatory compliance with laws and our internal rules, ethics offers an additional opportunity to ensure the Manitou group's continued growth and resilience.

The Manitou group Code of Ethics should serve as a guide throughout your working life within the Group; it has no effect without you. Our values and ethics are valuable resources that must guide the men and women of the Manitou group on a daily basis.

I therefore invite you to read this code, discuss it with those around you and promote it, including with our stakeholders, as it is a public document. It is our code of conduct and we should be proud of it.

When it comes to ethics and compliance, we all have a responsibility.

Michel Denis





DAY-TO-DAY ETHICS, BEHAVIOR AND DECISION-MAKING



Before making a decision, develop good habits and ask yourself the right questions for ethical conduct:

- %o Does what I am doing comply with applicable laws?
- %o Does what I am doing comply with the company's policies and rules?
- %o Can what I am doing have a negative impact on the health and safety of my colleagues or stakeholders?
- %o Can what I am doing have a negative impact on the company's reputation?
- %o Can what I am doing be harmful to the environment?

- %o Are human rights respected in the context of what I am doing?
- %o Does what I am doing add value to the company's activities?
- %o Would I be proud and willing to undertake what I am doing if the public or my friends and family were to find out about it?

If you are unsure, remember you are not alone. Your managers can help you find the solution or identify the right person to talk to.



COLLECTIVE RESPONSIBILITY

- %o The Manitou group complies with the laws and regulations of the countries in which it operates.
- %o In addition, the Manitou group has established an internal repository consisting of procedures that govern the functioning of Group employees. In the hierarchy of internal standards, the Code of Ethics is right at the top.
- %o The Manitou group has decided that all of its activities must be carried out within an ethical framework in order to protect its employees, stakeholders and reputation.

%o Manitou group employees are encouraged to exercise common sense and loyalty. They must act with good judgment and in an appropriate manner in all situations. Compliance with the Code of Ethics is a collective responsibility. Employees are invited to cooperate in any internal investigations launched in the event of misconduct.

%o The Code of Ethics is a tool for understanding the group's ethical principles and identifying its various components published in its reference framework. It must be considered as the first and essential step that guides employees to the resources they will need (such as reference procedures, for example) to help them find a response. It is accompanied by examples intended to facilitate their interpretation but cannot claim to answer all questions.

%o The principles of this code supplement, but do not replace, these fundamental laws, regulations and texts. For any Group activities not governed by such laws, regulations or obligations, they constitute the basis for the fairness and honesty that must govern its conduct. Each employee is responsible for knowing and applying these principles in all circumstances.

%o It is the responsibility of each employee to ensure that he/she complies not only with the rules laid down by the group, but also with the laws in force in the countries where they are required to participate in business dealings, whether they are at the origin of these or not. The violation of these laws is not only harmful to the employee involved in an offense insofar as they could be held personally liable, but also for the Group, which would expose itself to heavy fines and penalties as well as a major reputational risk.



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Le groupe Manitou est une entreprise familiale fondée sur des valeurs fortes.

L'éthique, le développement durable et la bienveillance sont le ciment de plus de 70 ans de succès. Parce que nous sommes une entreprise éthique, nous sommes profondément convaincus que la conformité aux lois fait partie intégrante de nos fondamentaux.

Nous exigeons de chaque employé du Groupe Manitou qu'il s'engage à respecter nos règles d'éthique et notre réputation.

L'éthique et la conformité sont l'affaire de chacun d'entre nous.

Jacqueline Himsworth - Présidente du Conseil d'administration
Michel Denis - Directeur général



%o The Manitou group places the highest importance on the Code of Ethics. Any conduct contrary to the *provisions of the Code of Ethics is subject to disciplinary action and may result in termination of the business relationship with the stakeholder(s) involved.*

RESPECT FOR FUNDAMENTAL HUMAN RIGHTS

The Manitou group scrupulously respects the Fundamental Human Rights set out in the following treaties:



The United Nations Charter of Human Rights



ILO Fundamental Conventions No. 29 (forced labor), No. 105 (abolition of forced labor), No. 138 (minimum age) and No. 182 (worst forms of child labor)






Principles 1, 2, 4 and 5 of the UN Global Compact






Principle 5 of the OECD Guidelines for Multinational Enterprises, and in particular those relating to work, in all geographical areas in which its employees operate. The Manitou group has the same requirements of its stakeholders.

CHILD LABOR

-  Regardless of the country, even if the legal limit is set at a lower age, the Manitou group is prohibited from employing
-  employees under the age of 15. Furthermore, work likely to compromise their health, safety or morality according
-  to the criteria set by the ILO is never entrusted to young people under the age of 18.

FORCED LABOR

-  The Manitou group does not tolerate any form of illegal work or employment conditions. This is particularly demonstrated
-  by the fact that the group refuses to use forced labor and any form of modern slavery.
-  Forced or compulsory labor means any work or service demanded of an individual under threat.

WORKING CONDITIONS

01. ENVIRONMENT AND WORKING CONDITIONS

SAFETY AND PHYSICAL AND MENTAL HEALTH IN THE WORKING ENVIRONMENT

All employees of the Manitou group are entitled to a safe and healthy working environment. The Manitou group considers it a priority to protect the safety and physical and mental health of employees.

To this end, everyone must integrate the health and safety dimension into their daily behavior by complying with the instructions, by helping to ensure compliance with them and by reporting any potential risk that they may have identified. Therefore, a preventive approach to accidents and health and safety risks should be favored, with a strong involvement of managers.

In order to maintain the level of requirements and continuously improve, the Manitou group adheres to a progressive ISO 45001 certification process.



HARASSMENT AT WORK

Prevent and protect victims of harassment at work, psychological harassment or sexual harassment.

For Manitou group employees, this means: never harassing, intimidating or threatening others and avoiding behavior that may legitimately be perceived as offensive or inappropriate. It also means: opposing harassment or other inappropriate behavior, whether it is you or someone else who is being targeted.

What is harassment? Any conduct or comment that creates, promotes or induces an offensive or intimidating work environment. This includes verbal or physical harassment, bullying, sexual harassment, abuse of power, inappropriate humor or any other actions that offend or cause suffering.



The group's whistleblowing platform allows any person who is the victim of or witnesses an act of harassment to report it in compliance with local laws. Reported cases are systematically the subject of an independent internal investigation. The perpetrator of an act of harassment is subject to penalties up to and including dismissal.

DECENT WAGES AND FAIR PAY

Beyond the management of risks and exceptional situations, the Manitou group guarantees decent working conditions for all its employees. This begins with adequate remuneration, i.e. sufficient to have a decent standard of living and in line with national or local legislation, the applicable minimum wage regulations or collective bargaining agreements. The group pays particular attention to the recognition of the work of its employees. In addition, unless there is a restriction or other permitted deduction, wages are paid directly to the workers concerned.



WORKING TIME AND ABSENCE

Generally speaking, in terms of working time, overtime, break time, authorized absences, as well as sick and parental leave, or any other type of absence applicable, the Manitou group requests strict compliance with national and local laws and, where applicable, collective agreements.

Finally, the Manitou group encourages the establishment of an organization that protects the work-life balance.

FREEDOM OF EXPRESSION AND SOCIAL DIALOG

The Manitou group recognizes the importance of consultation through enhanced social dialog, in compliance with local legislation. Employees are guaranteed the freedom of expression necessary to improve the quality of life at work and to ensure social relations that promote respect for fundamental human rights.

02. **ANTI-DISCRIMINATION AND FAIR TREATMENT**

FAIRNESS AND DIVERSITY

With a presence on every continent, the Manitou group considers the diversity of its teams to be a real asset. Ensuring fair treatment and equal opportunities for all the employees of the Manitou group in the context of their recruitment, remuneration and professional development is one of the fundamental principles of the Manitou group.

The Manitou group is committed to maintaining for its employees a working environment where management values and practices are based on respect for people, the integration of their differences and their diversity. In accordance with applicable local laws and regulations, the Manitou group is committed to:

- %o Not tolerating any discriminatory practices whatsoever.
- %o Recruiting, promoting, remunerating and training its staff based solely on their professional skills.
- %o Ensuring that the principles of diversity are respected in the group's various organizations.



03. **PROTECTION OF THE GROUP'S ASSETS**

Each employee is responsible for the proper use and preservation of the Manitou group's material and immaterial assets. Any misappropriation, misuse or waste of the company's resources has a negative impact on its performance and image.

- %o Material assets include work tools, systems and equipment, documents and various installations.
- %o Intangible assets constitute the "non-physical" assets of the Manitou group: information, knowledge, patents, trademarks, etc. Information obtained in the performance of our duties is subject to the rules of law and duty of confidentiality.

Any use of Manitou group equipment or facilities for personal use must be avoided. Limited and occasional use may however be tolerated and disclosed if it does not disrupt business and provided that it is not abusive or contrary to the safety rules laid down by the company.

Similarly, any employee engaged in a political and/or religious activity must do so outside of work time, without mentioning that they belong to the Manitou group and without using the company's resources.

04. **PREVENTION OF INSIDER TRADING**

The Manitou group is listed on a regulated market, which means that it must comply strictly with the regulations applicable to the use of inside information, the prevention of potential breaches by holders of inside information and the supervision of transactions on the company's securities.

Inside information is precise, non-public information relating to the company, which, if known to the public, would be likely to significantly influence the stock market price of the company's security upward or downward.

The fact of directly or indirectly carrying out transactions on the company's securities with knowledge of inside information, on one's own behalf or on behalf of a third party, is illegal and constitutes, in particular in France, insider trading. Insider trading is a criminal offense, which is heavily sanctioned.

The Manitou group protects inside information about it and restricts access to a limited number of people within the group. Each employee who has access to such information shall refrain from communicating it or using it for personal purposes.



In case of doubt, before carrying out a transaction on the company's security, contact the Legal Department.

05. **FRAUD PREVENTION**

Fraud is an intentional act consisting of deliberately deceiving others, using disloyal means intended to surprise their consent, to obtain an unlawful material or moral advantage or carried out to circumvent legal obligations or professional rules.

It is characterized in particular, either by pure and simple theft of the company's funds, securities or property, or by concealment or falsification of documents aimed at unduly obtaining said funds, securities or property.

The fraud prevention and detection mechanisms deployed by the Manitou group are essential in order to ensure legal and ethical behavior and contribute to its image as a committed and fair partner.



THE GROUP'S POSITION ON BUSINESS ETHICS

01. MANAGEMENT OF CONFLICTS OF INTEREST

The Manitou group has a desire to prevent situations in which a personal interest would conflict with a legitimate interest of the Manitou group; this involves the prevention of actual or apparent conflicts of interest:

- %o personal interest includes any advantage for oneself or for the benefit of a family member, friends, relatives or any persons or organizations with whom one has or had kinship or business relationships.
- %o a conflict of interest arises when an employee's personal interest is likely to influence them in their decisions or cast doubt on their impartiality in the performance of their duties and professional responsibilities.
- %o the Manitou group has put in place a system for detecting and managing conflict of interest situations accessible to all employees via the repository.

When a situation is established, the employee concerned must declare it transparently by means of the declaration of conflict of interest in accordance with the conditions set out in the procedure.
The employee will be substituted in such situations.

02. GIFTS AND INVITATIONS POLICY, DONATIONS

Receiving or offering gifts and invitations, especially to a public official, may be assimilated or constitute an act of corruption because it could harm the impartiality of the employee in the decision-making process in the context of a business relationship.

Under no circumstances may a gift or invitation be given or received for the purpose of obtaining an advantage or influencing decision-making in the context of a business relationship. Nor can it be done in violation of the laws or internal rules of the issuer's or the recipient's company.

The Manitou group permits the receiving or offering of symbolic gifts and business meals under reasonable conditions, with a legitimate purpose and of moderate value, for example an occasional meal, participation in an event sponsored by the company or resulting from sponsorship, etc. Reciprocity is a key element for assessing whether the gifts and invitations offered or received are appropriate.



In order to guarantee the integrity of the Manitou group, employees must:

- %o inform the third party that Manitou group has strict rules regarding gifts and invitations.
- %o take into account the gifts and invitations policy of their business partners, in particular that of their customers and suppliers.
- %o not accept gifts or invitations that may undermine the independence of judgment in the conduct of the employee's assignment.

If such a situation arises or there is any doubt, in accordance with the dedicated internal procedure, the employee must consult his/her line manager or the compliance team so that an appropriate decision can be taken to ensure the interests of the Manitou group.

03. **BUSINESS RELATIONSHIPS AND ANTI-CORRUPTION**

The Manitou group, which is a signatory of the UN Global Compact. Its principle no. 10 invites companies to act against corruption, prohibits any form of corruption in its business transactions and complies with international anti-corruption conventions and the anti-corruption laws of the countries in which it operates.

The Manitou group is a well-known player in the market and intends to maintain its integrity and protect its reputation. Its officers and directors have clearly positioned themselves on compliance with strong principles in the fight against corruption, money laundering and influence peddling. Business conduct is based on relationships of trust and mutual respect. Any form of corruption is unacceptable in the conduct of our business.



Thus, the employees and representatives of the Manitou group will not make or accept any bribe or facilitation payment in any form whatsoever. They are not only illegal in many countries but contribute to distorting the very nature of the business relationship that must be based on understanding and respect.

The use of agents must be approved in advance by the group's compliance team as defined by the agent procedure.

In order to secure the business relationship, dedicated provisions must be included in the contractual documents. These provisions must be validated by the legal department.

In order to protect themselves and the Manitou group, each employee exposed to the risk of corruption is required to follow the mandatory training provided by the Human Resources Department in compliance with local legal obligations.

The Manitou group participates in public procurement bids. For a government, public authorities or state enterprises, this involves purchasing goods or services. Contracts entered into within this context are governed by specific rules and procedures with which the Manitou group complies. It is formally prohibited to use any inappropriate means that may be assimilated to corruption in an attempt to influence the decision of public officials. The Manitou group responds to calls for tenders in accordance with healthy and fair competition. The use of local agents requires prior approval from the compliance team under the conditions set out in the agent procedure.

Any employee who observes a non-compliant situation must immediately report it to his/her line manager or human resources contact or, where applicable, directly report it through the group's whistleblowing system.

04. **INTERNATIONAL TRADE**

The Manitou group distributes its products in over 140 countries. International trade rules may contain restrictions or embargoes that may limit the possibility of exporting or importing certain products or services.

The marketing of certain products, services or technologies may be subject to local regulations specific to imports or exports, or even require an export license to be obtained before these products, services or technologies are shipped, particularly in the case of military applications resulting in the qualification of dual-use goods.

Finally, sanctions imposed against natural persons or legal entities or concerning certain categories of activities or goods may partially or totally limit our activity.

If such a situation arises or there is any doubt, the employee must consult his/her line manager, the Legal Department or the compliance team so that an appropriate decision can be taken to guarantee the interests of the Manitou group.

05. **FAIR COMPETITION**

The Manitou group ensures that it acts fairly towards its competitors, partners, customers or suppliers. The Manitou group complies with applicable competition law in all the countries in which it operates.

Competition law includes all rules intended to guarantee free competition between economic players. In general, these rules prohibit agreements with competitors or customers whose object or effect is to restrict or limit competition on the market. Competition policy consists mainly of combating two main types of anti-competitive practices: cartels (price fixing, market or customer distribution, exchange of sensitive information between competitors), and abuse of dominant position.

Unfair practices concern offenses committed in the context of relations between companies, such as parasitic commercial practices, unfair competition or resale at a loss.

The Manitou group prohibits any practice aimed at disregarding competition rules and in particular any exchange with competitors of sensitive information or concerted practices, any practice aimed at imposing the resale price of its products by its distributors or likely to restrict or alter competition.



The Manitou group provides training on the prevention of anti-competitive practices.

06. **RESPECT FOR CONFIDENTIALITY**

The Manitou group pays particular attention to confidentiality in the use of data, information, know-how, intellectual and industrial property rights and business secrets in connection with its activities and in the performance of its contracts.

The Manitou group ensures that each employee is made aware of the confidentiality of the data so that confidential or sensitive information is not disclosed directly or indirectly outside the company or communicated to internal employees within the Manitou group who are not authorized to receive it.

The departure of an employee from the company does not release him/her from his/her obligation to respect the confidential data of the Manitou group that he/she would have had at his/her disposal within the Manitou group.

Any sharing of confidential information with a stakeholder must be the subject of a confidentiality agreement signed prior to the sharing of the information. The Manitou group respects and intends to enforce the duty of loyalty.

The duty of loyalty binds each employee and continues after his/her departure from the group.

07. **TRANSPARENCY AND SINCERITY OF FINANCIAL AND NON-FINANCIAL REPORTING**



As a listed company, the Manitou group is subject to an obligation to provide accurate, precise and true information. All supporting documents used for the preparation of reports for publication must be managed and archived in accordance with the document retention policy established by the Manitou group. It is prohibited to destroy documents that could be used as evidence in regulatory or judicial proceedings.

Communication with investors is the sole responsibility of the Chief Executive Officer and the Secretary-General. All employees of the Manitou group are formally prohibited from responding to investors without the prior and formal consent of the Secretary-General.

08. PROTECTION OF PERSONAL DATA

The Manitou group is required to process certain personal data of its employees and partners in the exercise of its activities. Therefore, the Manitou group is required to comply with all its obligations regarding the processing (including collection, use or storage) of such personal data in compliance with local laws and regulations.

When acting as a data controller, the Manitou group undertakes to:

- %o only collect the necessary data, i.e. data that is useful to achieve a defined purpose.
- %o be transparent by providing data subjects with clear and complete information on the processing of their personal data.
- %o secure the personal data processed by taking security measures appropriate to the risks identified.
- %o delete the data as soon as the purpose for which it was collected has been achieved.
- %o anonymize the data in the event that the personal data needs to be used.
- %o allow data subjects to exercise their rights concerning their data via the address privacy@manitou-group.com.
- %o inform, where applicable, the interested parties in the event of a breach of access to their personal data.



09. MEDIA AND SOCIAL NETWORKS

• PRESS RELATIONS

- The corporate communication department coordinates, with the subsidiaries, all the group's communication actions.
- In order to protect the Group's reputation, all public statements on behalf of the Manitou group must be made exclusively by persons authorized by the corporate communication department.

USE OF SOCIAL MEDIA

Manitou group employees must exercise judgment when sharing information about the company through internal or external social networks.

Employees must not share confidential, proprietary, denigrating or devaluing information about the company, its employees or third parties. They must also ensure compliance with all rules and regulations relating to the confidentiality and ownership of personal data when they post photos of individuals or groups.

ENVIRONMENTAL COMPLIANCE AND FIGHT AGAINST CLIMATE CHANGE

01. ENVIRONMENTAL COMPLIANCE

THE MANITOU GROUP'S ENVIRONMENTAL POLICY

Aware of the impact of its activities on the environment and climate change, all of the Manitou group's businesses and sites work to: control and reduce the environmental impacts of our sites and products by managing the environment on a daily basis, in all functions of the company.

To do this, the group relies on all business lines to:

- **%o** Reduce greenhouse gas emissions with a proactive low carbon trajectory, which involves, among other things, limiting energy consumption, pollution and waste throughout the life cycle of machinery and production means.
- **%o** Circularize product and spare parts offerings, extend their life as much as possible and limit the use of the primary resources necessary for their development and maintenance.



PROTECTION OF THE ENVIRONMENT MUST BE SHARED BY EACH EMPLOYEE

The Manitou group voluntarily complies with strict standards and environmental regulations. Therefore, each employee must participate in this commitment of the Manitou group.

In particular, they are asked to:

- **%o** Comply with the recommendations and instructions in force, particularly concerning the management of chemicals, waste, energy, etc.
- **%o** Report any accident or abnormal or worrying situation to their manager or to the relevant health/safety/environment teams.



- Use the various channels available to suggest ideas for improvements to existing practices and means.

Beyond compliance with regulations, the Manitou group is voluntarily committed to actions to reduce its impact on the planet, thus contributing to the collective effort, consistent with its ecosystem. This is why the Manitou group requires and encourages its suppliers, partners and customers to adhere to the same approach, adapting it to their own business.

PRECAUTIONARY AND PREVENTION PRINCIPLES

In general, the Manitou group reminds its employees of its commitment to two principles:

- The principle of prevention which, beyond assuming its responsibilities and repairing damage to the environment, engages all employees of the Manitou group to take preventive measures to protect the environment at an early stage in order to prevent such damage from occurring.
- The precautionary principle whereby, even in the absence of certainty, taking into account current scientific and technical knowledge, measures to prevent a risk of serious damage to the environment or human health should not be delayed

02. PRODUCT LIFE CYCLE OPTIMIZATION

The Manitou group is particularly attentive, regardless of the countries concerned, to the marketing of machines meeting the highest environmental standards, and it endeavors to seek efficient, innovative and useful technical solutions for the customer in terms of products and services, with a view to reducing the TCO¹, particularly in energy consumption and product maintenance.

USAGE

Efforts are initially focused on the machine usage phase because this is where the main environmental impact of the Group's activities resides. The Manitou group undertakes to:

- Develop products and services with low CO2 emission and provide information on the environmental impacts of our solutions to our customers and users.
- Teach our customers and allow them optimized and secure use of their machines.
- Reduce the consumables necessary for the maintenance of the machines during their lifetime (oils, filters, tires, etc.).
- Allow the repair, reuse and recycling of both parts and machines thanks to eco-design and through suitable economic models.
- Innovate thanks to circular offers and transform customer practices.



¹ Total Cost of Ownership. This indicator takes into account the fixed costs (acquisition, interest, rent, residual value, etc.), but also the variable costs (maintenance, user training, etc.) related to the use of your machine.

OTHER LIFE CYCLE STAGES

With regard to other life cycle stages, the group also seeks to constantly improve its environmental performance and has thus adopted:

- %o An eco-design approach aimed at reducing the consumption of raw materials of components, favoring the use of recycled materials in our products, without compromising the safety, quality and increased longevity of the machine and improving the end-of-life of products.
- %o An approach to controlling the impact of manufacturing processes on the environment aimed at: controlling water and energy consumption; reducing the level of waste including buried waste; limiting pollution and in particular that relating to paint activity (VOC (volatile organic compound) emissions in air and water pollution). To move forward, the group is engaged in a gradual ISO 14001 and ISO 50001 certification process for our production sites.
- %o A logistics approach to reduce CO2 emissions related to transport.
- %o An approach to improve the environmental and societal performance of its dealers.



SOCIETAL COMMITMENT AND PRINCIPLE OF POLITICAL NEUTRALITY

In all geographical areas where its commercial and industrial activity is located, the Manitou group strives to be an active member of local communities by engaging in education and inclusion through:

- %o sponsorship actions
- %o volunteer missions in which Group employees can get involved

The Group is only involved in apolitical, non-religious projects free from any conflict of interest. In general, the Group observes an attitude of political neutrality. Accordingly, no contribution of any kind to a political organization or political party is permitted.

01. **RESPONSIBILITY EXTENDED TO SUPPLIERS**

The ethical commitments of the Manitou group are specified in the Group's Responsible Purchasing Charter. By signing this charter, our suppliers undertake to deploy the necessary mechanisms to comply with its principles.

Companies whose actions would be contrary to the ethical commitments of the Manitou group must undertake to implement a corrective action plan within a reasonable period of time. A supplier that continues to not comply with this position and not to implement corrective actions is subject to the application of additional actions, up to and including termination of the business relationship.

02. **EXCLUSION OF CONFLICT MINERAL PRODUCTS**

Conflict minerals are extracted in conditions of armed conflict and human rights violations. On the date of publication of this Code, these minerals are cobalt, tin, tungsten, tantalum, and gold.

The Manitou group refuses to use products or raw materials derived from the extraction and trade in "conflict minerals".

On the basis of the OECD principles and the regulations in force in the United States and Europe, the Manitou group strives to integrate these principles of responsible procurement into its contracts with its suppliers and, in so doing, raises their awareness of these issues.

The Manitou group's position is explained in the Responsible Purchasing Charter, where suppliers are expected to adopt similar positions or policies for their own supply chains.

MECHANISMS FOR IMPLEMENTING THE ETHICS POLICY

01. **USE OF THE CODE OF ETHICS**

ACCESS TO THE CODE OF ETHICS

- The unequivocal commitment of the Manitou group to adopt ethical behavior that complies with compliance rules covering all of its activities worldwide requires each of its employees to be aware of the regulations, standards and laws and of the expected behavior. The Code of Ethics, in its capacity as the highest internal benchmark, must therefore be accessible to everyone, anywhere and at any time. The Code of Ethics is available on the group's intranet site and on the group's website. It will also be distributed individually to all group employees who will acknowledge receipt thereof.



RESPONSIBILITY OF THE EMPLOYEE AND THE MANAGER

Each employee is responsible for adopting ethical professional behavior and for complying with the rules imposed by the group. This requires each person to (i) know and master the instructions and procedures relating to their role and the working environment, (ii) keep up to date and ensure that they have read the latest version of the document concerned (for information, all Manitou official documents are indexed and referenced in the repository). In case of doubt, this allows the employee to discuss with their line manager or any other person in the compliance team, the legal department or the human resources department in order to obtain the necessary clarifications.

Each employee must be aware of the whistleblowing procedure and, where applicable, report non-compliant behavior. Non-compliant behavior does not necessarily imply a desire to harm; many non-compliant acts are carried out in ignorance of the rules and do not imply the bad faith of the person committing them. Breaches of the Code of Ethics may expose you and our group to local or international sanctions.

The manager has additional responsibilities. For a start, he/she must lead by example. Each manager must be a model for his/her teams and must promote both ethical behavior and the systems made available by the group (rules, training program, alert procedure, dedicated whistleblowing website). The manager must also escalate suspicious situations or specific exposure risks so that they can be handled by the competent department in charge. The manager must also help revise internal procedures in order to keep them up to date; ethics and compliance are not fixed subjects and are constantly evolving.

INTEGRITY AND TRAINING PROGRAM

The Manitou group is fully committed to the ethical and compliance approach; in this context, it has set up a compliance team that reports to the Audit, Risk and Compliance Department within the Secretary-General. In partnership with the Human Resources Department, the compliance team has rolled out a mandatory training module including an E-learning module dedicated to the fight against corruption and a classroom-based course dedicated to the fight against corruption and the prevention of anti-competitive practices.

The Audit, Risk and Compliance Department has also published an intranet site accessible to all staff. This site offers various tools to allow personnel who are specifically exposed to get support on a daily basis in their ethical and compliance approach.



02. OUR INTERNAL RESOURCES

In order to support the Manitou group's ethical approach, the Manitou group has equipped itself with resources to guide each of its employees in their reflection.

At Board level:

• THE 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. In this context, the Vice-President of Audit, Risk and Compliance regularly presents before it, several times a year, a report on the progress of the work of the compliance team as well as the activity of the Ethics Committee of which he/she is a member.



At operational level:

THE ETHICS COMMITTEE



The Manitou group's Ethics Committee is responsible for ensuring the proper application of the Group's fundamental principles set out in this Code of Ethics and the Group's standards to which all of its employees adhere.

In particular, the mission of the Ethics Committee is to collect and process the reports sent to it via the internal whistleblowing system.

The Ethics Committee is composed of two members appointed by the Chief Executive Officer in agreement with the Chairman of the Audit Committee for a period of three years renewable without limitation.

By delegation of authority of the Chief Executive Officer, supervision of the activity of the Ethics Committee may be entrusted to the Secretary-General of the Manitou group.

ALERT PROCEDURE

You can also visit our corporate website

 <https://www.manitou-group.com/fr/groupe/ethique-et-anticorruption/> 

The reporting of criminal acts committed in the professional context, breaches of procedure or governance rules and behavior that violates ethics are not only detrimental to the Group, but also for its employees; it is therefore necessary for them to be reported on the secure website dedicated to whistleblowers.

Finally, the Manitou group proposes a tool that explains how alerts are managed. Simply consult the alert procedure available in the Group procedures. The online tool is available at: <https://manitou-group.integrityline.fr/>

This platform provides access to our main procedures and a web portal for submitting an online report, anonymously wherever possible. This platform also offers toll-free numbers to go through the process live with an operator. This tool is available 24 hours a day, 7 days a week, 365 days a year.

The Manitou group has implemented means to ensure that the whistleblower's identity remains confidential and that the whistleblower is protected from any form of retaliation for having made a report in good faith.

