



The Manitowoc Company, Inc. – Corporate Policy

Title: HUMAN RIGHTS AND ANTI-HUMAN TRAFFICKING		Policy Number: 929
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Issued By: General Counsel	Approved By: CEO	
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Policy & Purpose

The Manitowoc Company, Inc. and its worldwide affiliates (“Manitowoc” or the “Company”) are committed to maintaining the highest level of ethical standards in the conduct of everyday business. This Manitowoc Policy on Human Rights and Anti-Human Trafficking commits Manitowoc and our Third Parties to respect and promote human rights within our global business practices.

We recognize that local customs and traditions concerning human rights may differ from place to place, but we will not permit violations of Company standards, regardless of geographic location or lax enforcement of the law. Where local laws are less stringent than our Policy, we will operate in accordance with our standards. We will also work with stakeholders to continue to evolve our human rights approach and will update this Policy as lessons are learned.

Manitowoc is committed to upholding human rights for all people. This is fundamental to who we are, and we are proud to serve communities across the world. This commitment to protect human rights is reflected in our core values, which for us means doing the right thing and putting people first. It aligns with our purpose of making a difference in the lives of our team members, shareholders and communities that count on us. We are dedicated to implementing appropriate remediation when violations of this Policy are identified within our own business activities or through our third parties and business partners.

Manitowoc prohibits any action which in any way disregards international labor laws and human rights or violates any country-specific law or regulation.

Scope

This policy applies to all Manitowoc team members as well as third parties of the Company. We will demonstrate our human rights commitment at every level of our organization globally. We also apply the standards in this policy to the suppliers and partners that form part of the extended Manitowoc team. We expect that those who act on our behalf and those we partner with in every aspect of our business also adhere to this standard of business conduct. While this policy represents our Company’s own standard regarding human rights, Manitowoc supports and strives to uphold the human rights principles advanced by the International Labour Organization, the United Nations Universal Declaration of Human Rights, and the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.



Respect for Human Rights

Diversity and Inclusion

We embrace and value the diverse backgrounds of all team members and respect the cultures and values of the people in the communities in which we live and serve. We believe everyone should be treated with respect and dignity, and under no circumstances should any team member be subject to physical, verbal, sexual, or psychological harassment or abuse in connection with their employment. We do not tolerate any form of discrimination or harassment based on sex (including pregnancy, childbirth, breastfeeding or related medical conditions), race (including traits traditionally associated with race such as hair texture and protective hairstyles such as braids, locks, and twists), religion (including religious dress and grooming practices), color, gender (including gender identity and gender expression), national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status, registered domestic partner status, age, sexual orientation, military or veteran status, family leave or caregiver status or any other characteristic protected by state or federal law. Manitowoc recognizes the higher degree of vulnerability for indigenous peoples and the need for enhanced due diligence and proactive collaboration when we may impact those communities.

Violence in the Workplace & Safe Working Environment

We believe all employees are to be treated with courtesy and respect. Therefore, any form of violence, harassment, or intimidation including but not limited to mental, physical, or verbal abuse, or any other form of harsh or inhumane treatment is prohibited in the workplace. Harassment based on any immutable characteristic or protected classification is wholly inconsistent with this Policy and our expectations.

We are committed to providing a safe and healthy workplace that complies with all applicable laws, regulations, and internal policies. We also expect this from our suppliers and business partners. If any team member is provided housing by Manitowoc, we will ensure that the housing provided meets or exceeds host-country housing and safety standards.

Child Labor

The use of child labor is strictly prohibited, and all legal requirements for the work of authorized minors will be observed, particularly those relating to hours of work, wages, minimum education, and working conditions. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Manitowoc strictly prohibits the use of child labor and any form of forced or involuntary labor including prison labor, indentured labor, bonded labor, modern forms of slavery, or any other form of human trafficking as defined by the International Labour Organization.



Benefits, Hours, and Wages

All workers shall be paid at least the minimum wage required by applicable laws and shall be provided all legally-mandated benefits; workers shall not be forced to work in excess of the number of hours permitted under applicable law. Manitowoc believes in compensating team members competitively based on the relative local labor market and in accordance with any applicable collective bargaining agreements.

Freedom of Association

We respect all team members' legal rights of free association and collective bargaining without fear of reprisal, intimidation, or harassment. We are committed to establishing constructive dialogue with team members' freely chosen representatives. No discrimination nor retaliation due to an employee's engagement in any protected concerted activity will be tolerated. Employees' rights to discuss and mutually act on behalf of one another with respect to their terms and conditions of employment will not be violated.

Human Trafficking

We believe the employment relationship should be voluntary and the terms of employment must comply with applicable laws and regulations. Therefore, Manitowoc prohibits the use of forced labor and other forms of modern slavery. We condemn these practices and will not knowingly work with a Third Party who engages in these behaviors, including providers of contract labor. In keeping with this commitment, the Company endorses the California Transparency in Supply Chains Act of 2010¹ and the United Kingdom's Modern Slavery Act 2015², and their intent to prevent and eliminate slavery and human trafficking from global supply chains by increasing transparency.

To support the eradication of forced labor and modern slavery, we enhanced our Supplier Compliance Program to ensure that our sourcing is ethical and responsible. Manitowoc has a Supplier Code of Conduct, which includes prohibitions on the use of human trafficking and child labor, as well as provisions regarding fair labor and employment practices, business ethics, and global trade compliance. Suppliers represent and warrant compliance with that code as a term of their supply agreements. Manitowoc also audits its suppliers to confirm compliance with the Supplier Code of Conduct. Manitowoc has separate policies such as the **Conflict Minerals Policy** and **Manitowoc Code of Conduct**, to acknowledge and mitigate the risks that its activities and business relationships may pose on human rights.

On an annual basis, every Manitowoc employee affirms their compliance with our Company's Code of Conduct and Human Rights training.

¹ Cal. Civ. Code § 1714.43:

https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=CIV§ionNum=1714.43.

² UK Public General Acts 2015 c. 30: <https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>



In addition to our efforts focused on Manitowoc's supply chain, we are reviewing peer companies to help ensure Manitowoc's evolving policies and oversight practices are effective in helping eliminate unfair, unethical, or illegal working conditions and/or labor practices.

Government Contracts

Manitowoc's policy is to prohibit employees from engaging in severe forms of trafficking in persons (*i.e.*, slavery, bondage, involuntary servitude, or sex trafficking), procuring commercial sex acts (*i.e.*, a sex act in exchange for something of value) and using forced labor in the performance of any contract.

The federal government has a "zero tolerance policy" regarding trafficking in persons. The definition of "trafficking in persons" under the law is very broad and includes commercial sex acts or sex acts in exchange for something of value, such as prostitution and related activities, including pimping, pandering, or maintaining brothels. Trafficking in persons is a complex process. Many trafficking victims are forced to work in the sex trade. However, trafficking can also take place in labor situations such as domestic servitude, labor in a prison-like factory, or migrant agricultural work. Whether or not an activity falls under the definition of trafficking depends not only on the type of work victims are made to do, but also on the use of force, fraud, or coercion to obtain or maintain that work. There is one exception, however, Trafficking covers the use of minors for commercial sexual activity even if there is no force, fraud, or coercion.

Manitowoc and its employees are also prohibited from:

- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents (*e.g.*, passports or drivers' licenses);
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging employees or potential employees any recruitment fees;
- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment for an employee who is not a national of the country in which the work is taking place, unless a recognized legal exception applies;
- Providing or arranging housing that fails to meet the host-country housing and safety standards; or
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing and in a language the employee understands.



Manitowoc can be held liable for an employee's violation of these laws and regulations and penalties include terminating for default Manitowoc's U.S. Government contracts, or the suspension or debarment of the individual and/or Manitowoc. All employees involved in soliciting or performing work on Manitowoc's U.S. Government contracts must not engage in any form of trafficking in persons and must immediately report any potential or actual violations of this policy. Violations of this policy can result in a range of disciplinary measures, up to and including termination.

Reporting

If you encounter or receive a grievance regarding a potential violation of federal, state, or local laws or regulations, the Company Code of Conduct, this policy, or any unethical behavior, you may confidentially report your concerns to the Company by using our Whistleblower Hotline or contacting the Legal Department immediately. In addition, you can report a potential violation to your local Human Resources Department. For violation of laws prohibiting discrimination, retaliation, or harassment, you can make a report to the U.S. Equal Employment Opportunity Commission (EEOC) or the California Civil Rights Department (CRD) (if employed in California). Retaliation of any kind against an individual who reports their concerns in good faith will not be tolerated.

Contacts

Global Whistleblower Hotline: <https://ir.manitowoc.com/governance/Whistleblower-Hotline/default.aspx>