



EMPLOYEE CODE OF CONDUCT



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Building Our Future: A Message from Our CEO

Dear Team,

“We succeed when our customers excel. I do what is right. We work as a team. We deliver results. I am a Role Model.”

At The Manitowoc Company, Inc. (“Manitowoc”), we build more than cranes—we build trust, partnerships, and a better future for our customers and communities. We do this through innovation, hard work, and a shared commitment to ethics and the law.

This Employee Code of Conduct (“Code”) is here to help us live our Core Values: We succeed when our customers excel. I do what is right. We work as a team. We deliver results. I am a Role Model.

These Core Values guide our interactions with each other, direct the way we serve our customers, and influence our operations around the world. They provide clarity for making tough decisions. And they foster a workplace where everyone can speak up, be respected, and succeed together. The world around us keeps changing—but one thing stays the same: our commitment to legal and ethical conduct. This means we act with honesty, fairness, and care. Each of us, whether we’ve been here for years or we’re new to the team, has a role to play in protecting Manitowoc’s reputation and building a Company we’re proud to be part of.

I believe in this Code. I follow it myself, and I ask all of us to do the same. Let it inform our decisions, encourage open dialogue, and give us the confidence to raise concerns. Above all, be the kind of role model who inspires teamwork, trust, and accountability.

Thank you for everything you do to help Manitowoc grow and lead with integrity.

Sincerely,

Aaron H. Ravenscroft
President and CEO
The Manitowoc Company, Inc.

Our Vision, Mission, and Core Values

At Manitowoc, the way we work matters. Our Core Values guide our choices, shape our culture, and help us deliver great results for our customers and communities. They remind us to act with integrity, support one another, and lead by example.

These values are part of everything we do—and everyone at Manitowoc is expected to live them every day.

Our Core Values



I am a role model

- I celebrate successes.
- I learn from failures.
- I approach every day with a can-do attitude.
- I have fun.



I do what is right

- I work in a safe and environmentally responsible way.
- I respect others.
- I behave in an ethical way.
- I deliver quality work.



We work as a team

- We help each other to meet customer needs.
- I put the team first.
- I collaborate and support team members.
- I foster open, two-way communication.



We deliver results

- I do what I say I will do.
- I focus on continuous improvement.
- I innovate.
- I strive to exceed customer expectations.



We succeed when our customers excel

- I am committed to our customers' success.
- I provide a customer first experience every time.
- I am focused on improving the customer experience every day.
- I provide reliable and excellent service.



Using Our Code

In this section, you'll read about:

- *Be a Role Model: How to Use Our Code*
- *Speak Up*
- *How Manitowoc Responds*



The Manitowoc Employee Code of Conduct (“Code”) not only helps us make choices that are ethical and lawful, but it also sets the cultural standards that we strive to uphold every day. It reminds us to follow our Core Values, speak up when something feels wrong, and support each other in doing the right thing. This section shows us how to use the Code every day, ask for help when we need it, and understand what happens when we raise a concern.

Be a Role Model: How to Use Our Code

The Code doesn't cover every situation, but it helps us make informed and principled decisions. When we're still not sure what to do, we ask questions. We talk to our managers, HR, Legal, or any Manitowoc leader to guide us in our next steps.

How We Use the Code:



We know the rules

We learn the Company policies.



We do our best for the team

We make decisions with care and respect for others.



We follow our Core Values

We use our five Core Values to guide our actions:
We succeed when our customers excel.
I do what is right.
We work as a team.
We deliver results.
I am a Role Model.



We ask when we're unsure

If something doesn't feel right or we're not sure how to proceed, we speak up. There is not always only one right path. We talk to our managers, HR, Legal, or any Manitowoc leader for guidance.



We reflect before acting

We ask ourselves:

Would this comply with all applicable laws, regulations, and policies?

Yes, Proceed. No, Stop.

Is it honest?

Yes, Proceed. No, Stop.

Does it reflect our Core Values?

Yes, Proceed. No, Stop.

Would I be comfortable if this decision were made public?

Yes, Proceed. No, Stop.

Does it avoid any negative impacts on others or the Company?

Yes, Proceed. No, Stop.

If the answer to any of these isn't a confident "yes," pause and get help.



One Global Standard

Manitowoc operates across borders, cultures, and customs, but our commitment to integrity does not change. When local practices conflict with U.S. laws or our Company standards, we hold ourselves to the higher standard. No matter where we are—whether in an office, at a job site, or on the road—we are expected to represent Manitowoc with consistency, integrity, and accountability.



Company Policies on My Manitowoc

We can find all Company policies on the My Manitowoc website under “Company Policies.” These documents provide more detailed guidance on the topics covered in this Code. We review them to fully understand the rules and procedures that apply to our roles at Manitowoc.

Applicability

Our Code applies to all directors, officers, employees, independent contractors, and others who work for or with Manitowoc. Suppliers must follow our Supplier Code of Conduct.

Waivers

This Code cannot be waived.



Q: I heard on the news about a new environmental regulation that might affect how we handle equipment emissions. I’m not in a legal or compliance role. Should I be concerned?

A: Absolutely. You don’t need to be in a legal or compliance role to raise a question like this. If you come across information about new laws or regulations—whether through the news, conversations, or other sources—and you’re unsure how they might impact your work, it’s important to speak up. Talk to your manager, HR, Legal, or any Manitowoc leader to guide you in your next steps. At Manitowoc, we all share the responsibility to ensure our operations comply with the law. It’s always better to ask questions than to make assumptions.

Speak Up

We all have a duty to speak up when something doesn't seem right. This helps keep our Company honest, safe, and strong.

Why Speaking Up Matters

When we raise a concern, we help:

- Fix problems early
- Protect our coworkers and customers
- Promote fairness, respect, and our culture of accountability
- Support our Core Values and compliance with the law

Even small issues can become big if we ignore them. By speaking up, we protect our culture of integrity.

Your Responsibility

If we see or hear something that seems wrong—like unsafe work conditions, unfair or hostile treatment, or dishonest actions—it's our responsibility to say something. It's our responsibility to investigate and take appropriate action.

We can talk to:

- Our supervisors or managers
- HR or the Legal Department
- Any Manitowoc leader in the Company

If we're not comfortable talking to someone directly, we can use our confidential [Global Whistleblower Hotline](#).

Using the Hotline

The [Global Whistleblower Hotline](#) operates 24/7 and is managed by an external company to ensure confidentiality. Reports can be made anonymously; however, providing our names may assist in a more thorough investigation of the issue.

No Retaliation

Manitowoc does not allow retaliation, meaning we cannot be punished, treated unfairly, or isolated for raising a concern in good faith.



How We Contact the Hotline:

- **Online:** www.lighthouse-services.com/manitowoc
- **Email:** reports@lighthouse-services.com
- **Phone:**
 - USA & Canada (English): 844-470-0009
 - USA & Canada (Spanish): 800-216-1288
 - Mexico (Spanish): 1-800-681-5340
 - Other countries: Reference our [Whistleblower Hotline page](#) for a list of numbers

How Manitowoc Responds

When someone speaks up, we take it seriously. Every report is handled with confidentiality and respect, and is investigated thoroughly. We look into concerns in a fair and timely manner, and we take action when needed.

What Happens When We Raise a Concern

- **We listen** – Our concerns are received by an unbiased trained team or trusted outside partner.
- **We review** – The team assesses the facts in light of our policies and draws a conclusion about the appropriate action.
- **We investigate** – If more information is needed, the team investigates the allegation. This may include talking to others or reviewing documents.
- **We take action** – If there is room for improvement, we act accordingly. This might include training, changes to policies, or disciplinary actions.
- **We follow up** – We take steps to improve the Company and our ethical culture.

No Retaliation Allowed

Manitowoc does not allow retaliation—that is, we cannot be punished, treated unfairly, or isolated—for raising a concern in good faith.



Discipline and Corrections

If someone violates a law, Company policy, or part of this Code, we will take appropriate action to maintain and improve our ethical culture. This may include:

- Coaching or providing additional training
- Verbal or written warnings
- Job changes
- Suspension or termination

We always try to address issues in a fair way. Our goal is to teach and provide appropriate consequences to prevent the violation from occurring again.

Delivering Results for Our Customers

In this section, you'll read about:

- *Help Customers Excel*
- *Maintain Customer Privacy*
- *Serve Government Customers*

At Manitowoc, we focus on delivering safe, reliable products and services that meet our customers' needs. We protect their confidential information, follow the rules, and act with honesty in every deal. When we put customers first, we build trust and long-term success—for them and for us.



Help Customers Excel

We succeed when our customers excel. That's why we focus on delivering cranes and lifting solutions that are safe, reliable, and built to perform. By meeting our promises and supporting our customers at every stage, we help them excel, and strengthen our business in the process.

- Q:** A customer is pushing for faster delivery, and I'm tempted to promise a date we might not meet. Should I go ahead and say yes to keep the deal moving?
- A:** No. It's important to be honest about what we can deliver and when. Overpromising—even with good intentions—can lead to delays, frustration, and the loss of trust. Our success depends on our customers' success, and that starts with clear and honest communication.

How We Help Our Customers Excel

- **We show honesty in marketing** – We communicate clearly, respectfully, and truthfully about our products. We don't make promises we can't keep.
- **We deliver dependable quality** – We ensure every product meets our standards for safety, durability, and performance.
- **We honor our commitments** – We meet deadlines and deliver what we promise, every time.
- **We provide ongoing support** – We offer service, parts, and technical help when customers need it most.
- **We learn from our customers** – We listen to their feedback and use it to drive continuous improvement.



Maintain Customer Privacy

Our customers entrust us with their personal and business information, and it is our duty to keep it safe. We must comply with all applicable privacy laws and manage customer data carefully and only for work-related purposes.

How We Protect Customer Privacy

- **We keep customer information secure** – We store customer records safely and use secure systems that follow Company policies.
- **We respect privacy** – We do not discuss customer information in casual situations or with anyone who doesn't need to know.
- **We use data with care** – We access or share customer information only when it's part of our jobs and we have permission.
- **We ask if we're unsure** – If we're not sure whether information is private, or we have questions on what information can be shared, we talk to our managers, HR, Legal, or any Manitowoc leader.

We protect digital customer data

We always lock our workstations when unattended. Passwords must be a minimum of 12 characters and never be written down, stored electronically, or shared with others.



Q:

I'm working at a customer site and someone from their team asked me to forward project details that include internal Manitowoc notes and customer contact info. I'm not sure if I should share it. What should I do?

A:

Don't send the information right away. First, check whether the details are appropriate to share and whether the request came from someone authorized to receive it. If you're unsure, talk to your manager or the Legal team. At Manitowoc, we only share customer data when it's needed for business purposes and we know it's being shared with the right person.



To Learn More

User Security Policy

Electronic Communications Policy

Serve Government Customers

Manitowoc does business with governmental entities around the world. Unlike our transactions with other customers, our transactions with government entities are subject to strict regulations, especially those concerning bribery. We must comply with these regulations in all of our business dealings with government entities.

A governmental entity can be a public agency, military group, school, or public hospital. Such entities can be from any level or place—local, state, federal, foreign, or international. People who work for them—like buyers, agents, inspectors, or elected officials—are called government officials.

How We Work with Government Customers

- **We follow the FCPA** – Transactions involving government entities demand extra compliance measures under the Foreign Corrupt Practices Act (FCPA). We endeavor to understand and complete all required procedures.
- **We never give gifts or favors** – We don't solicit or offer bribes, kickbacks, money, gifts, gift cards, travel, entertainment, charitable or political contributions, or anything of value to government officials that could be perceived to influence a business decision or obtain an advantage.
- **We know who is a government official** – A government official is anyone who works for a city, state, or national government or for a government-run service.
- **We are careful with requests** – If a government official asks for a favor, we tell our managers or contact the Legal department right away.
- **We ask if unsure** – If we're not sure what to do, we ask our manager, HR, Legal, or any Manitowoc leader before taking action.



Q: A government customer hinted that we could “move things along faster” in exchange for a small favor later. It didn't sound like a bribe, but it felt inappropriate. What should I do?

A: Report the request to your manager or the Legal Department right away. Even informal offers, expediting fees, or small favors can violate anti-bribery laws and Company policy. At Manitowoc, we do not offer or accept anything of value to gain an advantage, especially when working with government officials.



To Learn More

Global Ethics Policy
Anti-Bribery Policy

Working As a Team

In this section, you'll read about:

- *Treat Others with Respect*
- *Avoid Discrimination, Harassment, Bullying, and Violence*
- *Work Safely*
- *Maintain Employee Privacy*
- *Support Human Rights*

We work best when we support each other—that is, we treat everyone with dignity and respect. We foster a culture built on fairness, inclusion, and collaboration—where each person is valued and given the opportunity to succeed. When we live out these principles, we create and strengthen the integrity of our workplace and create a sense of belonging.



Treat Others with Respect

Respecting each other helps make Manitowoc a great place to work. When we value each other's ideas, cultures, and backgrounds, we build a stronger Company. Everyone deserves to be treated fairly and given a chance to succeed—no matter who they are or where they come from.

This also means leaders must use their authority in a fair and respectful way. No one should use their position to treat others unfairly.

- Q:** My supervisor only listens to a few people on our team and often ignores the rest of us. Is that a problem?
- A:** It could be. Leaders should treat everyone with fairness and respect. If you feel left out or overlooked, talk to your manager (if you feel comfortable doing so), HR, Legal, any Manitowoc leader, or use the [Global Whistleblower Hotline](#). Everyone's voice matters at Manitowoc.

How We Show Respect at Work

- **We support equal opportunity** – We treat all coworkers fairly, no matter their background, age, gender, or beliefs.
- **We appreciate different viewpoints** – We are open to ideas and ways of thinking that are different from our own.
- **We work as a team** – We listen, collaborate, and help others succeed.
- **We are inclusive** – We make everyone feel welcome and part of the group. We embrace diverse ideas and experiences to make us stronger together.
- **We lead appropriately** – All of our leaders, supervisors, and managers must lead with respect. We do not use our positions to pressure, speak down to, or favor anyone. We lead by demonstrating good conduct and supporting our teams through mentorship and positive reinforcement.

To Learn More

Global Workforce Harassment Policy

Human Rights and Anti-Human Trafficking Policy



Avoid Discrimination, Harassment, Bullying, and Violence

We are committed to creating a workplace where everyone feels safe, valued, and respected. Treating each other with kindness and professionalism allows us all to do our best work. By fostering a positive and respectful environment—both in person and online—we help everyone succeed.

How We Prevent Discrimination, Harassment, Bullying, and Violence

- **We are kind and professional** – We choose words and actions that show care and respect for others.
- **We are mindful of others** – We consider how our actions and words may affect someone else.
- **We speak up if something feels wrong** – If we see or experience wrongful conduct, We talk to our managers, HR, Legal, any Manitowoc leader, or use the [Global Whistleblower Hotline](#).
- **We support those who speak up** – Anyone who raises a concern deserves to be treated with fairness and respect. And remember, Manitowoc does not allow retaliation.
- **We communicate with care** – Respectful behavior matters everywhere: in person, in emails and texts, and on social media. This obligation applies to everyone, even outside the office at places like vendor dinners, conferences, and during business travel.



What Conduct Is Prohibited?

Broadly speaking, the following are examples of conduct that are inappropriate at Manitowoc, and this is by no means an inclusive list. We take care with our actions and words to ensure that we are being respectful at all times.

- **Bullying** – Conduct meant to abuse or humiliate someone. This includes insulting someone, spreading rumors, excluding, or embarrassing someone on purpose.
- **Harassment** – Unwanted behavior that targets a person because of their race, religion, gender, age, disability, sexual orientation, or other personal traits.
- **Sexual Harassment** – Unwanted sexual advances, requests for sexual favors, or comments about someone's body. It can also include unwanted touching, making inappropriate jokes, or sharing sexual images. Sexual harassment takes many forms. Please refer to our policy for more specific examples.
- **Violence** – Any physical or verbal action that harms, threatens, or frightens someone. This includes yelling, hitting, pushing, or any kind of threatening behavior.



Q: Our manager often makes sarcastic remarks about our work and criticizes us in humiliating ways. It's affecting team morale and people are afraid to speak up. What should we do?

A: This kind of behavior may be bullying, and it's not acceptable at Manitowoc—regardless of someone's role or title. Managers are expected to lead with respect and professionalism, not through intimidation or humiliation. Talk to a manager, HR, Legal, any Manitowoc leader, or use the [Global Whistleblower Hotline](#). We take concerns like this seriously and are committed to fostering a workplace where everyone feels respected and supported.



To Learn More

[Core Values](#)

Global Workforce Harassment Policy

Human Rights and Anti-Human Trafficking Policy

Social Networking and Social Media Policy

Work Safely

Safety is our #1 priority at Manitowoc. It demonstrates our commitment to the well-being of everyone. Whether we work in factories, offices, or in the field, safety is a shared responsibility. By adhering to our safety guidelines and voicing concerns, we contribute to a safer environment and enable the best performance.

How We Stay Safe at Work

- **Safety is our #1 priority** – At Manitowoc, nothing is more important than keeping people safe. Every task, decision, and action must begin with safety in mind.
- **Every injury is preventable** – We believe that with the right planning, awareness, and commitment, all accidents can be avoided. Never accept injuries as “part of the job.”
- **Safety is everyone’s responsibility** – Whether we’re on the floor or in the office, each of us plays a role in maintaining a safe workplace. Be familiar with the applicable rules and procedures for given tasks and expect the same from everyone around you.
- **Everyone has the authority and responsibility to STOP unsafe work** – If something doesn’t feel safe, we speak up and stop the work. We are empowered—and expected—to act.
- **5S is essential for maintaining a safe workplace** – We keep our workspaces clean and organized using the 5S method: Sort, Set in order, Shine, Standardize, and Sustain. A tidy space reduces risks and increases focus.
- **Safety requires continuous improvement** – We look for better, safer ways to work, and speak up when something can be improved. Small changes today can prevent big problems tomorrow.
- **SLAM is to be used by every employee on a daily basis** – SLAM stands for Stop, Look, Assess, and Manage. It’s how we plan each task with safety at the center. It is our way of putting the mind before the hands for every job we embark on.
- **Our goal is ZERO injuries** – We aim for zero injuries—not as a slogan, but as a daily commitment. Everyone deserves to go home safe.



Q: During a production line walk, I witnessed a small item falling from an elevated height to the floor. Do I need to report it?

A: Yes, this is a near miss that must be reported. The falling item could have caused injury, and it is crucial to prevent recurrence. Our EHS team will analyze the incident to identify causes and propose effective solutions.



To Learn More

[Environmental, Health, and Safety \(EHS\) Policy](#)

SLAM and Interactive Observation systems

Local Safety Procedures

Emergency Preparedness Plans

Maintain Employee Privacy

We work hard to protect the personal and private information of our employees. Only those who need this information for work-related purposes are allowed to view and handle it. And anyone who handles personal or private information must do so with extra care.

How We Protect Employee Privacy

- **We protect personal information** – We keep employee files and records safe, use secure systems, and follow Company policies.
- **We respect privacy** – We do not discuss someone's private information, even in informal conversations.
- **We use data with care** – We use or share personal information only if we need it to do our jobs and have been authorized.
- **We ask if we're not sure** – If we don't know whether something is private or how to handle it, we talk to our managers, HR, Legal, or any Manitowoc leader.
- **We keep digital data safe** – We always lock our workstations when unattended. Passwords must be a minimum of 12 characters and never be written down, stored electronically, or shared with others.



Q: I was chatting with a coworker and mentioned that someone on our team is out for medical reasons. I didn't give details. Is that OK?

A: Even without details, talking about someone's health can be a privacy issue. It's best not to share any private or personal information about others unless you are required to for your job.



To Learn More

User Security Policy

Electronic Communications Policy

[Core Values](#)

Support Human Rights

As a global company, we are committed to respecting human rights within our operations and across our supply chain. We follow international labor standards and local laws, and we expect the same from our business partners. Our Human Rights and Anti-Human Trafficking Policy and Supplier Code of Conduct outline our expectations and align with the International Labour Organization (“ILO”), United Nations, Organisation for Economic Co-operation and Development (“OECD”) and other respected international organizations’ principles.

We do not tolerate the use of child labor, forced labor (which includes prison, slave, bonded, or indentured labor), human trafficking, discrimination, disciplinary practices, limiting worker’s freedom to associate, environmental violations, or unsafe health and working conditions. We also recognize that some communities—such as Indigenous peoples—may be more vulnerable, and we take extra care when our activities may affect them. Everyone who works with or for Manitowoc must respect international human rights standards without exception.

Q: A coworker said they were told they had to pay money to a recruiter to get their job. Is that allowed?

A: No. Our policy strictly prohibits charging recruitment fees or monetary deposits to any employee or contracted worker as a condition for applying or securing a job. If you hear about this happening, talk to your manager, HR, Legal, or any Manitowoc leader right away.



Our Commitment to Human Rights and Ethical Practices Across Our Operations

- **We align with global human rights standards** – Manitowoc’s Human Rights and Anti-Human Trafficking Policy and [Supplier Code of Conduct](#) support key international principles, including those from the ILO, the United Nations, and the OECD. These standards guide how we protect and treat people within our organization and supply chain—with respect, fairness, and dignity.
- **We prohibit the use of forced labor** – We do not tolerate any form of forced labor in the performance of our contracts. This includes modern slavery, prison, bonded, or indentured labor, human trafficking, involuntary servitude, or sex trafficking.
- **We prohibit the use of child labor** – We hire only those of the appropriate age—set by local law. Workers under the age of 18 must not engage in or be exposed to any work that poses health, safety, or environmental risks. To ensure safety and legal compliance, we adhere to international standards as defined by the ILO.
- **We use clear and fair job terms** – Contracted labor must be voluntary and free to terminate their employment at any time. Contracts must not include fees (recruitment or monetary deposits), must follow local laws, and be written in a language the worker understands.
- **We respect the freedom of movement** – Workers have the right to choose their employment freely and to leave or end their jobs at any time. Employers must never require them to hand over original identification documents, such as passports, visas, personal papers, land deeds, or academic certificates, as a condition of employment.
- **We do not tolerate harassment or abuse of any kind** – Everyone deserves to feel safe and respected. Verbal harassment including threats, yelling, insults, physical harm, intimidation, or fines used as disciplinary practice are never allowed.
- **We support the right to organize** – Employees must have the right to join a union and work together to make their voices heard without fear of retaliation or harassment.
- **We work only with trusted partners** – Our [Supplier Code of Conduct](#) bans these practices. Our Supplier Code of Conduct forbids forced labor and human trafficking. We do not engage with any business partner who violates these principles.
- **We hold business partners to high standards** – Our business partners must follow our [Supplier Code of Conduct](#) as part of their contract. We validate their adherence to our standards through our Supplier Compliance Program.
- **We support transparency laws** – We understand our responsibility to uphold human rights within our operations and supply chain by supporting the California Transparency in Supply Chains Act, the UK Modern Slavery Act, and other internationally recognized laws intended to stop human rights violations by making supply chains more open and fair.



To Learn More

Human Rights and Anti-Human Trafficking Policy

[Supplier Code of Conduct](#)

Doing What Is Right for Manitowoc

In this section, you'll read about:

- *Avoid Conflicts of Interest*
- *Exchange Gifts and Entertainment Responsibly*
- *Protect Company Property*
- *Manage Security and Prepare for Crisis Management*
- *Protect Intellectual Property*
- *Maintain Confidential Information*
- *Manage Third Parties Responsibly*
- *Keep Data Secure*
- *Avoid Insider Trading*
- *Keep Accurate and Reliable Records*
- *Communicate Appropriately*

Doing what is right means more than simply following the rules—it also means protecting Manitowoc’s reputation, resources, and the trust we’ve built with customers, business partners, and the public. Every one of our actions reflects upon our Company.

This includes how we share information, how we collaborate with others, and how we speak about Manitowoc. This section will help guide you in making choices that reflect care, honesty, and sound judgment in your daily work.



Avoid Conflicts of Interest

A conflict of interest occurs when something in our personal life could affect our ability to make fair decisions at work—or even create the appearance of unfairness. These situations can involve family, friends, or outside jobs, and they can impact the trust others place in our actions.

It’s not just what we do that matters—it’s how things may look to others. If a situation might appear to be a conflict, we speak up and get guidance before moving forward.

- Q:** I help select suppliers, and one of the bidders is a company where I used to work. Should I say something?
- A:** Yes. Tell your manager or HR right away. You may need to remove yourself from the decision-making process to keep things fair and avoid any appearance of favoritism.

How We Avoid Conflicts of Interest

- **We stay neutral** – We avoid giving special treatment to friends or family in decisions about hiring, promotions, or vendors.
- **We don't supervise family** – We may work at Manitowoc with relatives, but we cannot be in a direct reporting relationship with them.
- **We are on alert to potential conflicts** – We review the common examples of conflicts of interest and let our managers know if we're dating a coworker, working a second job, or have connections to business partners or potential ones that could raise concerns.
- **We are cautious with vendors** – We don't accept gifts or favors from customers or suppliers that might influence our judgment.
- **We speak up if unsure** – If something might be a conflict of interest, we talk to our managers or HR.



Common Conflicts of Interest

- Selecting a vendor where a friend or family member works
- Working closely with or managing someone we're related to or dating
- Holding a second job that competes with Manitowoc
- Using Company resources or confidential information in outside work
- Receiving a job offer from a company we interact with through our Manitowoc roles



How We Report and Manage Conflicts

- **We complete annual disclosures** – All our leaders must disclose personal ties to companies we do business with, and any other potential conflict of interest to Legal via email.
- **We speak up early and are transparent** – If we think a conflict might exist, we talk to our managers or HR right away. It's better to disclose it.
- **We manage the situation** – Our managers, HR, or Legal will review the situation. If needed, they'll collaborate to decide on next steps.
- **We keep records** – All reported conflicts are documented, along with the actions taken. This ensures fairness and transparency.



To Learn More

Global Ethics Policy

Exchange Gifts and Entertainment Responsibly

We make decisions based on integrity—not on gifts or special favors. While giving or receiving a modest gift or meal may be acceptable, it must be done appropriately and for the right reasons. It must never appear to be a bribe or an attempt to gain an unfair advantage.

We follow clear guidelines to avoid actions that could seem dishonest or influence decision-making.

How We Handle Gifts and Entertainment

- **We keep it small** – We only give or accept items of low value (generally under \$100), unless approved by senior leadership and Legal.
- **We never give or accept cash** – This includes gift cards or anything that functions like cash.
- **We ask first** – If we're unsure or think a gift may exceed the limit, we get approval in advance.
- **We are transparent** – Gifts and entertainment should be exchanged openly, not in secret.
- **We avoid pressure** – We never offer or accept anything to influence a business decision or gain a special favor.



- Q:** A supplier gave me a gift basket during the holidays. I think it's worth more than \$100. What should I do?
- A:** Let your manager or Legal know right away. If the gift exceeds the allowed value, you may need to return it or get approval to keep it.



When a Gift or Meal Is OK

A small gift, meal, or business-related event may be appropriate if it meets these conditions:

- It's not intended to gain an advantage or special treatment.
- It doesn't take place during a contract negotiation or major sales decision.
- It is modest—such as a coffee mug, lunch, or company-branded item.
- It serves a valid business purpose and includes the business contact.
- It is approved through standard expense or approval processes.
- It is legal and appropriate in the local culture.
- It happens only occasionally—not frequently.
- It is not intended for family members or friend.
- It is offered openly and properly recorded, if required.



To Learn More

Global Ethics Policy
Anti-Bribery Policy

Protect Company Property

All employees are trusted to use Company property responsibly. This includes equipment, tools, computers, and office supplies that help us do our work effectively. It's everyone's responsibility to protect these resources from damage, misuse, or loss.

Company property is intended for work-related purposes, so personal use is not allowed. We never damage, steal, or use Company assets inappropriately.



What Counts as Company Property?

- Tools, machines, and equipment
- Computers, phones, and printers
- Company documents and data
- Software and digital systems
- Office supplies

Company property also includes our confidential information and intellectual property, which we will discuss later.

- Q:** I downloaded Candy Crunch to my work phone to play during breaks. Is that a problem?
- A:** Yes. Personal apps—even games—can create security risks, especially on devices that store customer or Company information. Always follow Manitowoc's rules for using Company devices, and only download approved apps. If you've installed something by mistake, contact IT right away.

How We Take Care of Company Property

- **We use it for work** – We don't use Company equipment or supplies for personal reasons without permission.
- **We keep things private** – We don't share Company information, even if we do leave the Company.
- **We follow the rules** – We don't add software or go to websites that are not allowed.
- **We stay safe online** – We never attempt to access systems without authorization, including attempts to bypass or break passwords.
- **We speak up** – We tell our managers, HR, or the Legal Department if we are aware of any misuse or damage of Company property.



To Learn More

User Security Policy
Electronic Communications Policy
Software License Policy

Manage Security and Prepare for Crisis Management

Protecting our people, property, and information is essential to maintaining a safe and productive workplace. Everyone at Manitowoc plays a role in creating a secure environment and being prepared for emergencies.

How We Stay Safe and Ready

- **We are alert** – We watch for unusual activity, such as the presence of unfamiliar individuals in restricted areas or damaged equipment.
- **We protect information** – We keep passwords secure and protect Company data.
- **We follow safety procedures** – We know what to do in case of a fire, severe weather, or other emergency.
- **We report concerns** – We speak up right away if we notice anything unsafe or suspicious.
- **We stay prepared** – We participate in safety drills and learn our emergency exits.

Q: I noticed someone I don't recognize in a restricted area. What should I do?

A: Politely ask if they need help. If you feel unsafe, or hesitant to approach them, tell your supervisor or security. It's always better to raise a concern than to stay silent.



What We Do in an Emergency

- **We stay calm** – We take a deep breath and think clearly.
- **We follow instructions** – We listen to supervisors or designated emergency leaders.
- **We use safe exits** – We leave the building through the nearest safe and approved route.
- **We help others** – We offer assistance to coworkers if it's safe to do so.
- **We report our status** – We let someone know we're safe once we've exited.



Our Business Continuity Plan

Manitowoc has a business continuity plan to help keep operations running during a crisis. This plan includes backup systems, key contact lists, and detailed steps for restarting critical functions. Every team is expected to understand their responsibilities and be ready to respond.

Protect Intellectual Property

At Manitowoc, we develop unique innovations that give us a competitive edge—like product designs, brand names, and new technologies. These creations are called intellectual property (“IP”), and they belong to Manitowoc. Protecting our IP helps us grow and succeed responsibly.

We must also respect the IP of others. This includes not copying or using someone else’s work without permission. Many things found online—such as articles, images, videos, and logos—are protected by copyright and cannot be used freely. As we adopt new technologies like artificial intelligence (AI) to improve our work, we must use them safely and ethically, and with human oversight.

How We Protect Intellectual Property

- **We keep our work safe** – We do not share Company inventions, tools, or designs without proper approval.
- **We respect others’ rights** – We do not use software, content, or creative work that belongs to others unless you have permission.
- **We are careful with AI** – We use AI tools only if they are approved based on the Company’s policy.
- **We use approved tools** – We use authorized software and systems only.
- **We speak up** – We report suspected misuse of IP to our managers or the Legal Department.



Types of Intellectual Property

- **Copyrights** – Protect written work, software, music, and images
- **Trademarks** – Protect names, logos, and brand symbols
- **Patents** – Protect new inventions and how they function
- **Trade Secrets** – Confidential business information, like formulas or unique processes and methods





We Respect Copyrights

We always follow copyright laws when using content created by others. We use copyrighted material only under these conditions:

- Manitowoc owns it.
- We have obtained written permission from the owner.
- Our Legal Department has found that it meets the “fair use” exception.

We never post full articles, songs, or photos unless it has been approved. Linking to the full source rather than reproducing it online is a good way to avoid violating copyright violations. IP laws vary by country, so we seek the guidance of our Legal Department if there are any doubts.

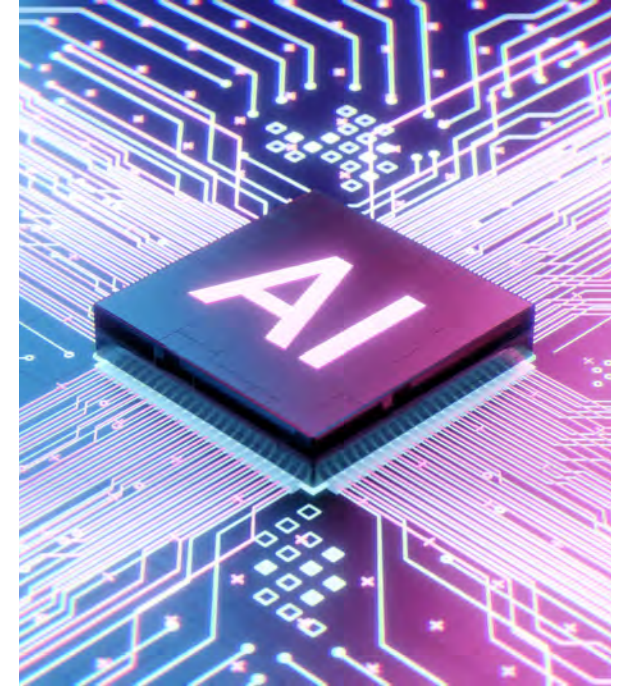


Using AI the Right Way

AI can help us work more efficiently, but it must be used responsibly. We always make sure:

- We have permission to use AI tools for our work.
- The results are reviewed by a subject-matter expert before being used.
- The information we enter is not private or sensitive.
- We follow Company policies and any legal requirements.

AI output may contain inaccuracies or made-up information that appears correct. *We cannot rely upon its output without thorough subject-matter review.*



Q:

I used an AI tool to write part of a report. Do I need to tell anyone?

A:

Yes. Let your manager know. AI tools can be helpful, but we must make sure the work is accurate and appropriate. Always follow Company policies when using new technologies.



To Learn More

User Security Policy

Electronic Communications Policy

Social Networking and Social Media Policy



Maintain Confidential Information

We work with sensitive information that supports our business and helps us succeed. This includes private information that we must keep confidential, such as customer details, financial data, product plans, and IP, such as trade secrets. Sharing this kind of information without permission can harm the Company and may even violate the law.

How We Protect Confidential Information

- **We keep it private** – We share Company or customer information only with people who are authorized to see it
- **We use the right systems** – We send and store work files using approved tools only. We do not use personal devices or accounts unless our managers have given permission to do so.
- **We protect trade secrets** – We do not reveal how we build, design, or improve our products.
- **We report leaks** – If we see private information shared by mistake, we tell our managers right away.



What Counts as Confidential?

- Trade secrets, product plans, and new inventions
- Customer or supplier names and business agreements
- Sales strategies or marketing plans
- Engineering designs and technical documents
- Internal messages, notes, or reports
- Financial data and Company planning details
- Sensitive information such as inside knowledge or patent filings

Q: I saw a coworker post a photo on social media that shows a whiteboard with new product plans. What should I do?

A: Tell your manager or our Legal Department right away. Even if it was accidental, the post should be taken down as soon as possible to protect the Company's confidential information.



To Learn More

User Security Policy

Electronic Communications Policy

Social Networking and Social Media Policy

Manage Third Parties Responsibly

Manitowoc works with a wide range of external partners, including suppliers, service providers, and contractors. These third parties help us deliver quality products and services. It's our responsibility to ensure they follow the same laws, standards, and values that we do.

Working with Third Parties

- **We pick the right people** – We partner only with organizations that are trustworthy and law-abiding.
- **We share our rules** – We make sure partners understand our expectations and the way that work should be done.
- **We protect our information** – We do not share Company or customer information unless authorized by management.
- **We say something** – If we see a partner acting in a way that is unsafe or inappropriate, we report it to our managers right away.

Q: I noticed a supplier isn't following safety rules. What should I do?

A: Tell your manager right away. All third-party partners are expected to maintain safe practices and comply with the rules.



What We Expect from Third Parties

- Following all applicable laws
- Treating workers fairly and ensuring a safe work environment
- Understanding and respecting this Code of Conduct
- Avoiding unfair business practices or special favors
- Protecting confidential and sensitive information



Keep Data Secure

Every day, we work with important information, such as customer records, financial data, business strategies, and personal details. We must protect this information across all devices, including computers, phones, and tablets.

Manitowoc uses secure systems to help safeguard data, but each of us also has a personal responsibility to follow best practices—especially when working with mobile phones, laptops, or smart devices.

How We Protect Data

- **We use approved devices** – We use Company–authorized phones, laptops, and tablets only.
- **We secure our equipment** – We enable passwords and other security functions on all devices, and we report lost or stolen devices right away.
- **We follow wireless rules** – Never change Wi-Fi settings or use Bluetooth to send work files.
- **We store with care** – We do not save files on mobile devices unless they are properly encrypted.
- **We are smart with AI** – We make sure any AI technology we use is authorized for our work and do not upload confidential or sensitive data unless we have specific authorization.



Data Safety for Devices

- We don't use Manitowoc passwords on personal devices.
- We use only apps and software approved by the Company.
- We do not store our email and files long term on mobile devices.
- We review our mobile bill if we use a Company phone to check for suspicious activity.
- We avoid using phones while driving unless we have hands-free tools.

Q: I need to send a file while traveling. Can I use public Wi-Fi at the airport?

A: No. Public Wi-Fi isn't safe. Use secure connections set up by the Company, like VPN. If you're not sure, ask IT before you connect.



To Learn More

User Security Policy
Electronic Communications Policy
Software License Policy

Avoid Insider Trading

At Manitowoc, we may sometimes learn important information about our Company—or other companies—before it becomes public. If that information could influence someone’s decision to buy or sell stock, it’s considered “inside information” and must be kept private until it is officially released.

Buying or selling a company’s stock on public exchanges while having inside information about that company is called insider trading—and it’s against the law. It is also illegal to share that information with others. Sharing tips so that others can trade is still insider trading.

How We Avoid Insider Trading

- **We keep it private** – We don’t share nonpublic Company information with anyone who is not authorized to receive it.
- **We don’t trade if we have inside information about stock** – We never buy or sell the stock of Manitowoc (or any other company) if we know confidential details that haven’t been made public.
- **We watch what we say** – We are careful in public places, online, and when speaking with friends or family.
- **We ask if unsure** – If we’re not sure what we can share or whether something qualifies as inside information, we check with Legal or our managers.



What Counts as Inside Information?

- Major customer wins or losses
- Mergers, acquisitions, or large business deals
- Changes in earnings, forecasts, or financial results
- New products or significant shifts in strategy
- Any nonpublic information that could inform an investor’s decision to buy or sell stock if made public

Q:

I heard about a big customer order that hasn’t been announced yet. Can I tell my friend who owns stock in Manitowoc?

A:

No. That’s insider trading—even if you don’t trade the stock yourself. Never share important nonpublic information that could affect an investor’s decision to buy or sell the stock.



To Learn More

Insider Trading Policy

Keep Accurate and Reliable Records

Maintaining accurate records—such as emails, contracts, reports, and financial documents—is essential for our business operations. Proper recordkeeping supports teamwork, protects our Company, and ensures we meet legal and ethical responsibilities. When we follow recordkeeping guidelines, we demonstrate integrity and accountability in everything we do.

How to Handle Records the Right Way

- **We know what to keep** – Certain types of paper and electronic records need to be kept for specific amounts of time. We follow the guidelines in our Global Record Retention Policy to know what should be saved and for how long.
- **We follow time rules** – We do not delete or throw away records too soon. We retain them for the specific amount of time listed in our Global Record Retention Policy.
- **We store records safely** – We use approved systems to store documents securely. We avoid leaving important files or papers where they could be lost or stolen.
- **We obey legal holds** – If the Legal Department says a record must be kept, we do not delete it. A legal hold means the record must be preserved for a legal matter. Ask if you are unsure about any record.
- **We report problems** – If we see someone not following our records policy, we tell our managers or the Legal Department.



Q:
A:

I want to clean out my emails. Can I delete old project emails?

Check the Global Record Retention Policy first. Some emails may need to be kept for legal or business reasons. Also confirm there is no legal hold in place. If the emails must be saved, follow proper storage procedures. If you're unsure, consult your manager or the Legal Department for guidance.



To Learn More

Global Record Retention Policy

Communicate Appropriately

The way we communicate matters. Whether we talk to others through email, online posts, or in person, in every case, we must be respectful and choose our words carefully. What we say and how we say it can affect Manitowoc's image and trust with others.

Only individuals authorized by the Company are permitted to act as spokespersons. If we're ever asked to talk to the media or share official Company news, we always check with our managers, HR, or the Legal Department first.

How We Communicate the Right Way

- **We speak for ourselves personally** – We do not speak for Manitowoc unless we have written approval.
- **We are respectful** – We use kind and professional language in all work messages.
- **We protect private information** – We do not share Company secrets or customer details in emails, posts, or texts.
- **We use Company channels** – All of our public posts or ads must be approved by the SVP of Marketing and Investor Relations.
- **We forward press and media requests** – If someone from the press, government, or public contacts one of us, we send them to the Investor Relations team.



Who Handles Public Questions?

- **Financial matters** – Chief Financial Officer
- **Accidents or injuries** – Legal Department
- **News and media** – Investor Relations
- **Job references** – HR only
- **Social media recruiting** – HR only

Q:

I want to share a post online about a Manitowoc product I worked on. Can I?

A:

Not without written approval. Only official Company accounts may post on behalf of Manitowoc. If you want to share your work, talk to your manager, HR, Marketing, or the Legal Department first.



To Learn More

Social Networking and Social Media Policy
Electronic Communications Policy

Doing What Is Right for Our Community

In this section, you'll read about:

- *Support Community Involvement*
- *Avoid Bribery and Corruption*
- *Compete Fairly*
- *Prevent Fraud*
- *Prevent Money Laundering*
- *Follow Trade Controls*
- *Protect the Environment*
- *Engage in Political Activities Responsibly*



At Manitowoc, we build the communities of tomorrow. We give back to the places where we live and work to make a meaningful and lasting impact on the future. We each play a role in doing what is right for everyone around us.



Support Community Involvement

Manitowoc is part of many communities around the world. We follow local laws and respect local customs. We also believe in giving back. We support employees who volunteer and help make their communities better.

We can get involved in many ways. However we choose to help, we expect everyone to do it with care and respect.

- Q:** I'm helping organize a local food drive. Can I post about it at work and invite coworkers to join me?
- A:** Yes—as long as it's respectful and not disruptive. It's great to create an open and inclusive workplace by inviting others. Be sure to ask your manager or HR before using any Company tools, space, and time.



How We Support Our Communities

- **We follow the law** – If local laws seem to conflict with U.S. laws, we should follow U.S. laws and/or consult our managers, HR, Legal, or any Manitowoc leader.
- **We respect local customs** – We are thoughtful about the culture and people where we work.
- **We give our time where it matters** – We volunteer in ways that make a real difference to our community and reflect what we care about most.
- **We represent Manitowoc with respect** – When joining public or civic events, we act with integrity and kindness—our actions reflect on all of us.

To Learn More

Political Contribution Policy

Social Networking and Social Media Policy

Avoid Bribery and Corruption

Manitowoc does business by being honest and providing exceptional quality and service to our customers. We never offer or accept bribes, kickbacks, money, gifts, gift cards, travel, entertainment, charitable or political contributions, or anything else of value to improperly influence decisions. These standards apply in every country where we have operations.

At Manitowoc, we do not tolerate bribery in any form. Offering or accepting bribes—whether involving domestic or foreign government officials—violates the law and goes against our values. We support transparency by keeping complete and accurate records and complying with anti-bribery laws everywhere we operate.

How We Prevent Bribery and Corruption

- **We do not offer or accept bribes** – We never give or accept anything of value to influence someone improperly. This includes money, gifts, gift cards, or favors to gain business advantages.
- **We follow local laws** – Bribery is both illegal and harmful to our reputation. We learn and comply with anti-bribery laws in every country where we work.
- **We maintain honest records** – We are transparent and always maintain receipts and document expenses and payments truthfully and clearly.
- **We vet third parties carefully** – We ensure agents, consultants, partners, or any third parties acting on our behalf share our commitment to integrity.
- **We speak up if unsure** – If something doesn't feel right, we ask our managers or contact the Legal Department before moving forward.



Q: A sales agent working for Manitowoc overseas says we need to offer a “small gift” to help close a deal. It seems common in that country. Is it OK?

A: No. Even small gifts can be seen as bribes. If someone suggests this, speak to your manager or Legal right away. We must follow anti-bribery laws everywhere we do business.



What Counts as a Bribe?

A bribe involves offering or giving something of value to unfairly influence a decision. The goal might be to secure a contract, avoid a fine, gain confidential information, or receive special treatment. Bribes are not limited to money. Examples include:

- Cash or gift cards
- Favors, such as priority access to an office or service
- Job offers, even short-term consulting
- Donations to charities or political groups
- Covering someone's travel, school, or living expenses
- Business deals that personally benefit an official



To Learn More

Anti-Bribery Policy

Global Ethics Policy

[Core Values](#)

Compete Fairly

We are committed to fair and honest competition. We comply with all applicable fair competition laws, also known as antitrust laws, in every country where we operate. These laws help ensure a level playing field and protect consumers.

We do not make secret deals with competitors or engage in unethical behavior like fixing prices or dividing markets. We compete by delivering superior products and outstanding service—not by violating the rules.

How We Compete Fairly

- **We comply with antitrust laws** – We understand and follow fair competition laws wherever we do business.
- **We avoid competitor agreements** – We never make deals with competitors about prices, customers, or territories.
- **We make independent decisions** – We set pricing, sales strategies, and customer relationships independently, without influence from competitors.
- **We use caution in conversations** – We avoid discussing sensitive topics like pricing, bidding, or business plans with competitors.
- **We consult Legal if we're unsure** – If we have any doubts about what's appropriate, we contact the Legal Department before taking action. We should also reach out if a competitor brings up any of these topics.



Q: If I'm at a trade show when someone starts talking about pricing and which customers certain companies should target, what should I do?

A: Leave the conversation immediately and report it to the Legal Department. Even listening to this type of discussion can raise serious concerns. Acting quickly helps protect both you and the Company.



Topics We Should Never Discuss with Competitors

- Prices or pricing plans
- Which customers you will or won't serve
- Sales areas or territories
- Plans to raise or lower prices
- Who will win or lose a bid



How We Learn About Competitors the Right Way

- We use public sources, like websites, advertisements, or news.
- We ask customers what they like or don't like about other products.
- We never request confidential information from a competitor.
- We never encourage a customer to break a confidentiality agreement they have with another company.



Prevent Fraud

Fraud occurs when someone lies or hides the truth to obtain something improperly. This includes actions like concealing defects, faking records, or misusing Company property. Even small acts of dishonesty can damage our Company, our reputation, and the people we serve.

How We Help Prevent Fraud

- **We are honest** – We provide accurate and complete information in our work.
- **We follow the rules** – We understand and follow Company policies and procedures.
- **We watch for red flags** – We pay attention to unusual incidents, such as missing receipts, suspicious charges, or inconsistent records.
- **We protect Company resources** – We use Company funds, equipment, and assets responsibly.
- **We speak up** – If something seems wrong, we talk to our managers, HR, Legal, any Manitowoc leader, or report it through the [Global Whistleblower Hotline](#).



Examples of Fraud

- Lying on expense reports
- Overcharging for products or services
- Making fake entries in records
- Paying fake vendors or nonexistent employees
- Providing kickbacks



To Learn More

Global Ethics Policy

Q: A coworker entered the same charge under two different project codes. It looked strange, but maybe it was a mistake. What should I do?

A: Report it to your manager, HR, the Legal Department, or the [Whistleblower Hotline](#). Even if it turns out to be an error, it's better to check. Things like double-billing or mislabeling expenses can lead to bigger problems if they go unnoticed.

Prevent Money Laundering

Money laundering is committed when someone hides money earned through illegal activities by making it appear to come from a legitimate source. At Manitowoc, we do not engage in or allow any form of money laundering.

Even if we are not committing the crime ourselves, helping someone else move illegal funds—intentionally or by mistake—can result in serious legal and reputational consequences.

How We Help Prevent Money Laundering

- **We know our customers and partners** – We work only with individuals and businesses we trust.
- **We look out for red flags** – We watch for strange payment methods, suspicious paperwork, or people who avoid sharing full information.
- **We ask questions** – If something feels off about a transaction or deal, we speak up.
- **We follow the process** – We use the Company's systems to screen parties and follow all required checks when handling money or working with new partners.
- **We report concerns** – If we suspect money is being moved in an unusual or illegal way, we notify our managers or the Legal Department immediately.



Red Flags for Money Laundering

- Requests to break a payment into smaller amounts
- Use of cash in situations where it's uncommon
- Fake, incomplete, or missing business documentation
- Payments coming from or going to unexpected countries
- Business partners unwilling to provide full names or background details

Q: A new customer wants to pay using a complicated method that doesn't make sense for the type of sale. What should I do?

A: Don't proceed with the transaction. Speak to your manager or the Legal Department. Unusual or confusing payment methods can be signs of money laundering, and we must stay alert in every financial interaction.

Follow Trade Controls

Manitowoc operates globally, which means we must follow trade control laws that regulate what we can ship, where we can send it, and with whom we are allowed to do business. These laws enforce tariffs and embargoes, and they protect national security by preventing illegal or dangerous transactions.

Some of our products can be used in both civilian and military applications. Because of this, we must take extra care when exporting and ensure we follow all applicable trade laws in the countries where we operate.

How We Follow Trade Control Rules

- **We know the rules** – We learn and follow regulations related to exporting, importing, and cross-border shipments.
- **We are careful with technology** – Some products and software have restrictions on where and to whom they can be sent.
- **We check the customer** – We make sure we have complete information about the end user and that we are not working with restricted individuals, companies, or countries.
- **We understand the end use** – We always identify the intended use of our product and where our product will be used, including the associated project, if known.
- **We watch for red flags** – We stay alert to signs that a product may be used improperly or illegally.
- **We report problems** – If something seems suspicious or unclear, we contact our managers or the Legal Department.



What to Watch for in Trade Controls

- Unusual shipping routes or requests
- Customers who refuse to explain how they'll use the product
- Requests to send goods to a different country than the one on the order
- Missing or fake paperwork for exports
- Origin or destination countries that are subject to trade sanctions or embargoes

Q:

A customer wants to ship a crane to a country I've never heard of. How do I know if it's allowed?

A:

Don't approve the order until you check with Legal. Some countries have strict trade control laws, and we must be sure every shipment follows all legal regulations.



To Learn More

International Transactions Policy

Protect the Environment

We are committed to protecting the world around us. This means using energy wisely, minimizing waste, and keeping the air and water clean.

We've set Company-wide goals to lower pollution, reduce waste, and shift toward cleaner energy sources. Everyone at Manitowoc has a role to play in helping us reach these goals.

How We Help Our Environment

- **We follow the rules** – We comply with all environmental laws and Company policies.
- **We save energy** – We turn off equipment and lights when not in use.
- **We use less** – We reuse and recycle materials when possible. Avoid unnecessary waste.
- **We prevent spills and leaks** – We handle chemicals safely and report any issues immediately to our managers, HR, Legal, or the EHS team.
- **We share ideas** – If we have suggestions for eco-friendly improvements, we speak up.



What It Means to Protect the Planet at Manitowoc

- **Clean air** – We take steps to reduce emissions and air pollutants from our operations.
- **Less trash** – We reuse and recycle materials to limit landfill waste.
- **Cleaner energy** – We explore options like solar and wind power for a more sustainable future.
- **Employee action** – We encourage employee involvement with programs like the WorkGreen Award.
- **Safe products** – We design our cranes to meet environmental and safety standards.

Q: While visiting a job site, I saw a vendor storing oil containers next to a storm drain. Could that be a problem?

A: Yes. Storing oil or other hazardous materials near a storm drain can lead to serious environmental harm and may violate local laws and Manitowoc policies. Report it right away to your manager, the EHS team, or Legal so the issue can be investigated and addressed.

Engage in Political Activities Responsibly

Manitowoc respects your right to participate in the political process. Everyone at Manitowoc is free to support the causes and candidates that matter to each of us individually. However, political activities must remain separate from your work.

We may not use Company time or resources—like phones, printers, or email—for political purposes unless we have received approval from our managers. No one should give the impression that Manitowoc supports a belief or political opinion that we hold as individuals.

How We Handle Political Activities at Work

- **We do it on our own time** – We participate in political activities only when we are off the clock.
- **We use our own tools** – We do not use Company equipment or systems for political purposes.
- **We speak for ourselves individually** – We avoid suggesting that our views reflect those of Manitowoc.
- **We watch what we wear or display** – We do not wear Company-branded items to political events or post campaign signs at our workstations.
- **We respect differences and do not push our views on others** – There is nothing wrong with having strong opinions, but we must always listen respectfully and avoid pressuring others to agree. Everyone should feel comfortable expressing their views without fear of judgment or exclusion.



What About Political Contributions?

- Manitowoc does not donate to political causes or candidates.

Q:

I want to volunteer for a local campaign after work. Can I use my work printer to make flyers?

A:

No. Political materials should not be created using Company equipment. Keep your political activities separate from your job.



To Learn More

Political Contribution Policy

[Core Values](#)

Speak Up

Speak Up

Remember, we all have a duty to help each other and build a better future. If we see or hear something that seems wrong, we speak up.

In these cases, we can talk to:

- Our supervisors or managers
- HR or the Legal Department
- Any leader in the Company



If we're not comfortable talking to someone directly, we can use our confidential Whistleblower Hotline.

Using the Hotline

Our Global Whistleblower Hotline is open 24/7. It's run by an outside company, so our reports stay private. In some places, we can report without giving our name. But remember, sharing your name can help us look into the issue more fully.

We do not allow anyone to retaliate against anyone else for reporting a concern in good faith.



How We Contact the Hotline:

- **Online:** www.lighthouse-services.com/manitowoc
- **Email:** reports@lighthouse-services.com
- **Phone:**
 - USA & Canada (English): 844-470-0009
 - USA & Canada (Spanish): 800-216-1288
 - Mexico (Spanish): 1-800-681-5340
 - Other countries: See our Whistleblower Hotline page for a list of numbers



Statement of Personal Responsibility



Statement of Personal Responsibility

- I understand that I am responsible for reading, understanding, and following the rules in The Manitowoc Company, Inc. Employee Code of Conduct.
- I understand that if I do not follow the Code, I may face disciplinary action.
- I also understand that I must report any suspected or observed misconduct involving Manitowoc's business—whether by an employee, supplier, or customer. Failing to report such issues is also a violation of the Code.

Certification

I have read, understand, and agree to follow the standards outlined in The Manitowoc Company, Inc. Employee Code of Conduct.

▪ **Signed:** _____

▪ **Date:** _____





Regional headquarters

Americas

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