



The Manitowoc Company, Inc. – Corporate Policy

Title: HUMAN RIGHTS AND ANTI- HUMAN TRAFFICKING		Policy Number: 929
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Issued By: Senior Vice President of Human Resources	Approved By: CEO	
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Policy

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 neither those customs nor lax enforcement of the law can permit violations of Company standards, regardless of geographic location. Where local laws are less stringent than our Policy, we will operate in accordance with our standards. If there is a lack of clarity on the competing claims of rights bearers, we will work with stakeholders to seek resolutions that are consistent with this policy. We will also work with stakeholders to continue to evolve our human rights approach and will update this Policy as lessons are learned.

This Policy applies to the directors, officers, and all employees of the Company as well as to all Third Parties of the Company that provide products or services for Manitowoc; compliance with this policy is a condition of doing business with the Company. Third Parties are defined as any agents, consultants, distributors, intermediaries, and other individuals or entities with whom the Company conducts business. All employees, as well as Manitowoc Third Parties, are expected to become familiar with, and comply with, this Policy, and to recognize and report any potential human rights abuse to the Legal Department and/or Human Resources Department.

Respect for Human Rights

Diversity and Inclusion

Respect for human rights is of paramount importance to the Company therefore we work to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, national origin, ethnicity, religion, age, disability, sexual orientation, or any other status protected by applicable law. The basis for recruitment, hiring, placement, compensation and advancement at the Company is qualifications, performance, skills and experience.



Violence in the Workplace

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.

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.

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.

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 2010 and the United Kingdom’s Modern Slavery Act 2015, 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 our sourcing is ethical and responsible. Manitowoc undertakes social and regulatory compliance verifications for key Third Parties in each region, representing approximately 80% of our spend. This annual verification includes requesting our Third Parties to certify they prohibit the utilization of any forced or compulsory labor, including human trafficking. Non-compliant Third Parties will be offered additional resources and remedial opportunities on a case by case basis in effort to bring their program into compliance.

On an annual basis, every Manitowoc employee affirms their compliance with our company Code of Conduct. Furthermore, employees who interact with Third Parties will undergo training in our Supplier Compliance Program, human rights issues, and on-site due diligence requirements.

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.



Reporting

If you encounter what you believe to be a potential violation of local laws or regulations, the Company Code of Conduct, this policy, or unethical behavior, you may confidentially report your concerns to the Company by using our Whistleblower hotline or contacting the Legal Department and/ or our Corporate Trade Compliance Specialist immediately. In addition, you can report a potential violation to your local Human Resources Department. Retaliation of any kind against an individual who reports their concerns in good faith will not be tolerated.