



CODE OF CONDUCT FOR BUSINESS PARTNERS

Hyster-Yale Group, Inc. (“HYG”) (together with its subsidiaries collectively referred to as the “Company”) is committed to achieving the highest standards of legal and ethical conduct. As a part of maintaining these high standards, the Company requires that its agents, consultants, dealers, distributors, sales or service agents and suppliers, among others, (herein referred to as “Business Partners” or “You”) certify to uphold these same standards. Over and above the strictly legal aspects involved, You, and your personnel are expected to observe high standards of business and personal ethics in the discharge of your responsibilities to HYG.

I. INTRODUCTION

The Code of Conduct for Business Partners (the “Code”) is designed to explain how the Company expects You to conduct your business dealings with the Company or when acting on its behalf, if so authorized. The Code obligates You to abide by the Company’s tradition of honest, ethical and lawful behavior, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.

The Code applies to all of your personnel in any way involved in transactions with or for the Company. All such personnel should be thoroughly familiar with the Code. Copies of the Code are available upon request without charge from the Company.

You are responsible for reporting violations of law or the Code either directly to the Company’s legal department or through the Corporate Compliance Alertline. The Corporate Compliance Alertline may be accessed via the internet at <https://hyster-yale.ethicspoint.com>. Any report made will be kept confidential to the extent possible and permissible by law, and no reprisals will be taken against an individual who makes such reports.

The following is a summary of the Company’s expectations.

II. CONFLICTS OF INTEREST; GIFTS, ENTERTAINMENT AND BUSINESS COURTESIES; POLITICAL CONTRIBUTIONS; AND GOVERNMENT OFFICIALS AND ILLEGAL PAYMENTS

Conflicts of Interest.

You should avoid situations where your private interests interfere in any way with the Company’s interests. You need to be especially sensitive to situations that have even the appearance of impropriety and promptly report them to the Company. If You believe that a transaction, relationship or other circumstance creates or may create a conflict of interest, You should promptly report that concern to the Company’s legal department so that a determination can be made whether the situation constitutes an actual conflict of interest. It is the Company’s policy that circumstances that pose a conflict of interest are prohibited unless a waiver is obtained. If You believe You have a conflict and would like to request a waiver, please contact the Company’s legal department.

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Gifts, Entertainment and Business Courtesies.

You are prohibited from making any gift, payment, loan or granting any favor to the Company, any Company personnel, any present or prospective customer, supplier, service provider or any other business partner or third party—particularly where the purpose is to influence his business judgment or to induce him to compromise his duties. You are also not permitted to accept from such persons or entities any similar gifts, payments, loans or favors. These prohibitions do not include (a) the gift or receipt of gifts of tangible property of nominal value not exceeding normal standards of ethical business conduct or (b) normal entertainment for business purposes consistent with customary industry standards.

Political Contributions.

You may not make or promise to make any contribution, directly or indirectly, on behalf of the Company to any political party or candidate for public office.

Government Officials and Illegal Payments.

You are prohibited from granting or accepting any gift, payment, loan, or favor, to any government official, including without limitation: (i) officers or employees, at any level, of a government or of any department, agency or instrumentality thereof; (ii) any other person acting in an official capacity for, or on behalf of, a government or any department, agency or instrumentality thereof; (iii) officers and employees of state-owned or state-controlled enterprises; (iv) elected officials; (v) customs and tax inspectors; and (vi) government procurement officials. All of the foregoing individuals are referred to in this Code as “government officials”. For purposes of this Code, an enterprise is considered state-owned or state-controlled if state ownership exceeds 50%, or if the state directly or indirectly (such as through another state-owned enterprise) controls the enterprise.

This prohibition does not include gifts to a government official of tangible property of nominal value not exceeding normal standards of ethical business conduct for business purposes consistent with customary industry standards, so long as such gifts or entertainment are consistent with applicable governmental laws and regulations of all applicable jurisdictions including, without limitation, the United States (*e.g.*, the U.S. Foreign Corrupt Practices Act) and the country represented by the government official. Any gift that may fall within this exception must receive prior written approval from the Senior Vice President, General Counsel and Secretary of Hyster-Yale, or his or her designee.

III. CORPORATE OPPORTUNITIES

You are not permitted to take for yourself or others opportunities intended for the Company. You also are prohibited from competing with the Company and using Company property, information or position for personal gain.

IV. PROHIBITION AGAINST USE OF CONFIDENTIAL “INSIDE” INFORMATION

You are not permitted to divulge confidential information pertaining to the Company or any affiliated company or any of its customers to any individual who does not have a direct Company-related need to know such information. Confidential information may include, but is not limited to, non-public information relating to acquisitions, dispositions, business plans, earnings, financial or business forecasts or competitive information that might be useful to competitors or harmful to the Company or its customers, if disclosed. You may not seek to obtain any confidential information of customers, suppliers or competitors in an illegal or unethical manner. No information obtained by You as the result of your relationship to the Company may be used for personal profit or on behalf of third parties or as the basis for a “tip” to others, unless the Company has made such information generally available to the public. This requirement relates not only

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to transactions with respect to stock and other securities but also to any situation where undisclosed information may be used as the basis for inequitable bargaining with an outsider. Insider trading is unethical, illegal and strictly prohibited.

V. MAINTAINING ACCURATE BOOKS AND RECORDS

No false or fictitious entries may be made in, and no information that should be recorded shall be omitted from your books and records for any reason. All entries in your books and records must properly reflect the nature of the transactions in full compliance with applicable accounting rules. This includes any information You may provide to the Company.

VI. COMPETITIVE PRACTICES AND FAIR DEALING

Collaboration with competitors of the Company by those acting on behalf of the Company may be illegal, and discussions concerning certain topics should be avoided. These topics may include pricing, production, marketing, inventories, product development, sales territories and goals, market studies and proprietary or confidential information. It is against Company policy to engage in illegal or improper acts to acquire a Company competitor's trade secrets, customer lists, financial data or information about facilities, technical developments or operations. In addition, it is against Company policy to urge competitors' personnel or customers to disclose confidential information or to hire competitors' employees to obtain confidential information. It is also against Company policy to take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. You should endeavor to deal fairly with the Company's customers, suppliers, competitors and employees.

VII. EXPORT AND IMPORT REGULATIONS

It is the Company's policy to comply with the export and import regulations of the countries where it conducts business, which regulate and limit the Company's ability to import and export goods and materials, and which control and/or restrict the export of certain goods and technology to specific countries. For further guidance regarding export and import regulations, please contact the Company's Import/Export Customs Compliance Officer.

VIII. HUMAN RIGHTS AND FORCED LABOR

The Company expects and requires that its Business Partners respect human rights and commit to ending any kind of slavery, human trafficking, forced labor, child labor or other form of inhumane treatment. In particular, Business Partners must comply with the Company's Forced Labor Statement, available at the Environmental and Corporate Responsibility section of the Company's website at www.hyster-yale.com/investors/corporate-governance. In that same section of the website, Business Partners may find additional information regarding the Company's policies on forced labor, including compliance with the California Human Trafficking Law and the Company's UK Modern Slavery Statement.

By conducting business with the Company, Business Partners consent to Hyster-Yale performing periodic and comprehensive reviews of your business operations (and those of your subcontractors, as appropriate) to ensure you are in complete compliance with our policies.

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IX. INTELLECTUAL PROPERTY

You must respect the intellectual property and confidential information of other parties. “Intellectual property” is a term that describes creative works whose authors and inventors have legal rights to them. Copyrights, patents, trade secrets and trademarks are some examples of intellectual property.

X. PENALTIES

Any violation of the Code may cause the Company to cease doing business with You and be cause for the Company to terminate any agreement with You.

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