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VANTAGE CODE OF  
**BUSINESS CONDUCT**

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# OVERVIEW

## The Purpose of This Code

The *Vantage Code of Business Conduct* defines the guiding principles on how we act as employees, officers, directors and consultants of the Vantage organization and its operating companies. The aim is to establish a common ethical foundation on which we base our day-to-day interactions and behaviors and, as appropriate, to document those behaviors in related company policies.

## Our Mission

The strategic vision of Vantage is to operate as ‘One company, serving our Customers, with the Power to Move.’

Our operating companies serve across the Vantage Group as the single-point provider of systems and components to customers in the elevator industry. Our dedicated employees are committed to providing customers with cost-effective, best-in-class solutions and unwavering product support.

In everything we do, we want to uphold a strong reputation for honesty, integrity, and accountability. This in turn will help us create real value for our stakeholders, including customers, employees, suppliers, owners and the communities where we operate.

## The Guiding Principles

There are guiding principles that provide a foundation for the success of our business:

- **Safety, Ethics, Fairness and Honesty.** Employee safety and the safety of our customers and partners is an absolute priority. We must respect each other and the environment, keep everyone safe, be trustworthy, and act lawfully, ethically, and with integrity in all our business activities and relationships. Our ethical behavior is built on trust, respect, and integrity.
- **Customer Solutions and Support.** Customers have choices. Our success as a supplier is based on helping our customers remain successful. This means providing them with cost-effective solutions that meet their needs and schedule requirements. It means delivering products that are safe, easy to install, and reliable in service with excellent technical support.
- **Personal Growth and Development.** As a business, we commit to listening to our employees and taking their ideas seriously, providing them with opportunities to develop and grow in their responsibilities based upon merit and fairness, and maintaining a culture of life-long learning.
- **Strategic Support.** Business conversations should be clear and respectful on all business matters. Together we must behave with honesty and integrity, balance

challenges with opportunities, and work for the long-term success of all operating companies.

- **Delivering Results.** We should all set realistic but aggressive targets for our contributions to Vantage and take ownership for doing our best to deliver on those targets. By checking our egos at the door and working collaboratively, we can ensure Vantage remains the leading solutions provider of our industry.

### **Report Improper Behavior**

If you suspect a violation of the *Vantage Code of Business Conduct* or any law or regulation, you should bring the matter forward as soon as possible. You are encouraged to talk to your supervisor or another appropriate member of staff or contact The Vantage Confidential Reporting Hotline, which is available round the clock every day.

**Hot Line 1-800-395-0939**

<https://reportanissue.com/vantage>

## **SAFETY, ETHICS, FAIRNESS, AND HONESTY**

### **Provide a Safe and Healthy Workplace**

We are committed to ensuring everyone has access to a safe, healthy and secure work environment, especially with the challenges of global pandemics. We will provide continuous training on safe work practices, invest in personal protection equipment, establish policies allowing remote activity as and when advisable, and require compliance with all applicable laws and relevant industry and environmental standards to make sure employees and other persons affected by our business activities always remain safe.

### **Act Ethically and Obey the Law**

Throughout Vantage, we are committed to acting ethically and complying with the laws and regulations of all the countries in which we operate. Vantage will not tolerate bribery, kickbacks, or corruption of any kind, directly or indirectly through third parties. This Code will help you stay compliant by guiding you through the actions you need to take. However, it is your responsibility to read this Code thoroughly and understand its contents and to read and understand all related company policies, including the Vantage Anticorruption and Sanctions Policy and the Information Security Policies of the company. You may be required to periodically acknowledge compliance with the Code and these company policies.

### **Avoid Conflicts of Interest**

A conflict of interest is a transaction or relationship that presents – or even appears to present – a conflict between your obligations to Vantage and your own personal benefit. These conflicts can arise when you take actions or have interests that may make it

difficult to perform your company-related work objectively and effectively.

You should avoid any situation where your personal or financial interests might cause your loyalties to be divided from that of the business, or where you recognize that there could be potential conflicts of interest (either real or perceived).

Conflicts can also arise when you, or a member of your family or household, receive improper personal benefits as a result of your position in Vantage.

Common situations that can lead to a conflict of interest include:

- Engaging in activities that compete with Vantage's interests.
- Receiving cash, benefits, entertainment or gifts of more than modest value from customers, suppliers or competitors to Vantage.
- Serving as an officer, director, employee or consultant for any customer, business partner or competitor of Vantage without the prior approval of the appropriate level of management.
- Acquiring or maintaining an ownership interest in any customer, business partner or competitor of Vantage
- Supervising, reviewing or influencing the job evaluation, hiring, pay, or benefits of any family member in Vantage or in any customer or business partner of Vantage.

It is your responsibility to stay proactive and promptly disclose any actual or potential conflicts of interest to the appropriate level of management. In most cases, conflicts can be resolved by disclosure and an open and honest discussion. In some cases, an *Acknowledgement of Confidentiality Obligations* may be required. In other cases, you may need to be re-assigned or even recused from certain business decisions. Vantage may request an annual written confirmation from you, disclosing any and all potential conflicts.

### **Deal Honestly, Ethically and Fairly with Everyone**

Here at Vantage, we strive to outperform competitors fairly by offering superior products and services. This should never be done through illegal, unfair, or questionable measures. Our policy is to compete independently, and never to collaborate with competitors to restrain competition or trade or to engage in bid rigging, price fixing, market division, boycotts of third parties, or other illegal anti-competitive activities. We must operate in accordance with applicable antitrust and competition laws and regulations wherever we do business.

Relationships with vendors must be based on lawful and fair practices, as well as providing fair value to the company. We will only deal with vendors that comply with the

law, treat workers fairly, provide a safe and healthy work environment, protect the environment and follow the same ethical practices as Vantage.

### **Respect Data Privacy**

We are committed to handling the personal data of our employees, customers, and vendors responsibly and in compliance with applicable privacy laws and Vantage policies. No personal data may be shared with anyone – inside or outside the company – unless they have a legitimate business need to see it, or if it is required by law or regulation. When authorized, data is to be shared in secure means in accordance with the Information Security Policy of the company.

### **Be Careful with Gifts and Favors**

In our dealings with customers, vendors and other third parties, we may sometimes have the opportunity to offer or accept gifts, meals, travel and other things of value. While these activities may help to build valuable working relationships, they need to be handled properly. Otherwise, they can easily lead to actual or perceived conflicts of interest – or even accusations of bribery.

The following rules apply for gifts and favors:

- Giving something of value is only permitted if it is reasonable in scope, value and frequency, consistent with accepted local business practice, is not for an improper business purposes, does not give the appearance of impropriety, and is not a violation of law or the ethical practices of the organization of the recipient. When dealing with government representatives, stricter standards often apply.
- You may accept any common and reasonable courtesies that are usually associated with customary local business practices from persons or businesses that do or seek to do business with Vantage. However, you should never seek or accept any gifts, favors, entertainment, or payments for your own benefit or someone else's that does not have a legitimate business purpose. Also bear in mind that you are never allowed to accept a gift of cash in any amount.
- Items worth more than \$100 USD may give the appearance of a conflict and should not be given or accepted without receiving advance approval from your manager.

### **Don't Exert Any Improper Influence**

When you are working for or on behalf of Vantage, you are never authorized to offer, promise, give or accept anything of value that is intended to improperly influence a business decision of someone doing – or seeking to do – business with the company. This includes bribes, kickbacks, facilitation payments and fraud. Any gifts or other things of value that are made or promised to government officials or commercial partners must be acceptable by the person's organization, reasonable in value, legally permissible and appropriately document the business purposes. It must never be for the purpose of

securing an improper business advantage, and it must not violate the law or any ethical practices of the recipient's organization.

### **Comply with Global Trade Laws**

Here at Vantage, we must understand and comply with all trade laws and regulations when doing business around the world. This includes the importing and exporting of products, services or technologies. We must be particularly cautious when it comes to ensuring compliance with custom rules, embargoes, anti-boycott restrictions, and trade sanctions. This includes avoiding doing business with any prohibited governments, entities or individuals that have been sanctioned by the U.S. Government or other governments where Vantage does business, as set forth in Vantage Anticorruption and Sanctions Policy.

### **Protect the Environment**

We will conduct all our operations in a manner that safeguards the natural environment, complies with all applicable legal environmental regulations and other requirements, prevents pollution, and continually improves our environmental performance.

## **CUSTOMER SOLUTIONS AND SUPPORT**

Customers will always have a choice. Our success is based on helping our customers remain successful. We do this by spending time listening to our customers, thoroughly understanding their needs, and then working collaboratively across the organization to surpass their expectations by providing them with complete product solutions.

We do this by ensuring that our products are safe, easy to install, and reliable in service with excellent technical support. We respond timely to our customers' needs and make them our number one priority.

Statements about our products and services will always be truthful, accurate and never misleading. This is critical to preserving the trust, integrity and reputation we have with our customers.

## **PERSONAL GROWTH AND DEVELOPMENT**

### **Don't Tolerate Harassment**

No harassment or abusive conduct of any kind will ever be tolerated at Vantage, whether it is done in person, in print, or using electronic communications. Harassment includes verbal or physical behavior that aims to threaten, intimidate or coerce another individual. This also includes taunting and bullying, using racial or ethnic slurs, and making discriminatory remarks.

Any form of harassment based on someone's gender or sexual orientation is completely unacceptable. This includes unwelcome sexual advances, requests for sexual favors, or any other behavior that is unwelcome and personally offensive. This may include a range of subtle and not so subtle behavior from individuals of the same or a different gender.

### **Never Discriminate**

Here at Vantage we value workforce diversity and we believe that every employee and prospective employee has the right to be treated fairly, based on their individual skills and effort. We are committed to providing equal opportunities across all of our employment practices including selection, hiring, promotion, transfer, and compensation of all qualified applicants and employees. This should be done without regard to race, color, gender, sexual orientation, religion, age, national origin, disability, citizenship status, marital status, or any other similar status protected by law. We will not tolerate discrimination of any kind.

Any harassment and discrimination prohibited by these policies will be unacceptable not only in the workplace but in any work-related scenario. This includes business trips, business meetings, and business-related social events.

We all share the responsibility of understanding and preventing discrimination and harassment. Employees in a supervisory role have the special responsibility to act promptly to eliminate any discrimination or harassment. A supervisor who witnesses or is notified about harassing behavior must report the matter to human resources immediately – even if the people involved do not report to them, or if the behavior occurred outside of their area of responsibility.

## **STRATEGIC SUPPORT**

### **Share Your Input and Stay Aligned**

We encourage everyone to offer input and opinions when it comes to the development of Vantage's integrated business strategies. However, once decisions have been made, we need everyone to get aligned and help Vantage deliver on its business strategies.

Optimism is a 'force multiplier'. Work just as hard – if not harder – at identifying solutions to problems as you do at identifying those problems. Balance the legitimate interests of all of Vantage's constituents, without letting the day-to-day pressures of the business prevent you from doing what is right.

Approach any task as if what you do will be on the front page of the newspaper, and only act in ways that would make Vantage proud of your conduct!

### **Protect Our Assets**

Make sure to protect all company assets and use them efficiently. Company assets include intellectual property, equipment, tools, materials, supplies, and technology



resources such as computers, phones, mobile devices, and communication services like internet access and telephony service that belong to Vantage. If you suspect any fraud or theft, you should report this immediately for investigation.

Vantage equipment should not be used for non-business purposes, except for incidental personal use that does not harm the business.

You must also do all you can to protect Vantage's proprietary information. This includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business or marketing plans, scientific and manufacturing ideas, designs, databases, records, salary information, and unpublished financial data and reports.

### **Protect Confidential Information**

You must maintain the confidentiality of any proprietary and confidential information you have access to, except when disclosure is authorized by Vantage's established written policies or required by laws or regulations. Confidential and proprietary information is non-public information that might be of use to competitors, or harmful to Vantage if disclosed. It also includes information that suppliers and other business partners have entrusted to us.

You must never misuse a competitor's confidential or proprietary information by improperly soliciting or procuring that information. You must never cause someone else to do so in violation of their confidentiality obligations.

### **Use Email and Internet Appropriately**

You should only use Vantage's email, internet and information systems for legitimate business purposes, and in compliance with all applicable information and cybersecurity policies as well as relevant laws and regulations. Incidental and occasional personal use of these systems is permitted within reasonable limits, so long as that use is not inappropriate, disruptive or offensive to others. Vantage reserves the right to monitor and review all digital activity, which means you cannot expect any privacy when it comes to your usage of these systems.

### **Maintain Proper Records and Controls**

We are committed to maintaining a system of internal controls to provide reasonable assurance that our business objectives are achieved effectively and efficiently, that assets are safeguarded, that financial statements are reliable, and that operations conform to applicable laws and regulations. It is your responsibility to comply with these controls to ensure that all quality, safety, personnel, and financial records accurately reflect the underlying reality.

## **DELIVERING RESULTS**

## Performance Culture

We want to ensure that Vantage remains a preferred investment by meeting aggressive targets in every economic environment. As a business, we expect high performance alongside strong integrity, which both provide opportunities that benefit our employees, our customers, our vendors, and the communities where we do business. We will never sacrifice of our integrity or values in order to achieve business success.

# REPORTING

## Report Improper Behavior

If you notice any illegal or unethical behavior or violations of Vantage policies, we encourage you to talk to your supervisor or another appropriate member of staff. If you suspect a violation of the *Vantage Code of Business Conduct*, the Information Security Policies, or any other company policies, laws or regulations, you should bring the matter forward as soon as possible.

There are several channels you can use to ask a question, seek advice or report a concern regarding suspected improper behavior:

- Your Manager
- Your Human Resources representative
- The Legal Department
- The Vantage Leadership Team
- The Vantage Confidential Reporting Hotline, which is available round the clock every day.

**Hot Line 1-800-395-0939**

<https://reportanissue.com/vantage>

- You can choose to identify yourself or remain anonymous.

## Never Retaliate for Good Faith Reporting

Employees that raise good faith concerns about possible violations of *Vantage Code of Business Conduct* help the Company correct problems before they grow. We will not tolerate any retaliation against an employee for raising a business practice issue in good faith. Reports made in good faith will not be the basis for discipline or discrimination.

Should there be an internal investigation of misconduct that involves you, you are required by Vantage policy to cooperate fully with the investigation.



## **Discipline for Violations**

We are committed to doing business the right way. Any violations of the *Vantage Code of Business Conduct* will result in varying levels of discipline, including termination of employment. If the violation involves potentially civil or criminal activity, the individuals in question may be reported to appropriate authorities or civil action undertaken.