



Vantage Code of Business Conduct



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1. Overview

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 include them in our company policies.

2. Scope

This Policy applies to all employees, officers, directors and consultants at all Vantage business units located in the United States and Canada.

The policy will be formally reviewed periodically to ensure continuous improvement and adherence to all applicable laws. If any provision conflicts with applicable local, state, provincial, or federal law, the law will take precedence while ensuring alignment with our values and standards. Vantage reserves the right to make changes as needed to address immediate concerns or evolving circumstances. Any updates to the policy will be communicated to employees in a timely manner.

3. Our Mission and Vision

The Vantage Elevation Mission and Vision Statements articulate the purpose and direction of our organization. The Mission Statement defines our core purpose – why we exist and what we strive to deliver every day. The Vision Statement outlines our long-term aspirations and the future we are working to create. These statements inspire our strategy, influence our decisions, and foster a unified culture rooted in shared values and goals.

3.1 Mission Statement

Safely connect people and communities by providing essential elevator solutions.

The safety of our people, employees, and the riding public is the focus of every action and decision we make every day.

3.2 Vision Statement

Enable and empower our people and customers to succeed by providing innovative solutions, outstanding experiences, and operational excellence.

Our operating companies serve the industry as a preferred supplier of components and solutions for customers across the elevator industry. Backed by a team of dedicated professionals, we deliver cost-effective, best-in-class products and unmatched support – driven by a steadfast commitment to complete customer satisfaction.

4. Our Corporate Values (CLIMB)

Vantage's core values serve as the foundation for our long-term success. Our strategic mission and vision center on operating with safety and quality as the cornerstones of everything we do. Guided by the principles presented below in "CLIMB", we strive to reflect our core values in every action we take and every decision we make.



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.

Through CLIMB we aspire as a company to go higher, do better and go further!

5. Management Responsibilities

Vantage leaders are expected to serve as ethical role models and to embody the company's values and highest standards of integrity. A key part of management's role is to communicate the importance of ethical conduct and demonstrate personal commitment by holding everyone equally and consistently accountable for making sound, ethical decisions. Leaders must remain vigilant to identify any actions or situations that could be unethical or harm Vantage's reputation. Timely and effective action must be taken to resolve such issues, ensuring there is no perception of implicit approval.

6. Employee Engagement

Vantage is committed to creating and maintaining a workplace where employees feel safe, heard, and understood. Employee engagement practices will be a part of an ongoing process at Vantage, via regular surveys and reporting. We are committed to the following four principles:

1. To provide every employee with a voice in a safe, confidential, and anonymous manner
2. To improve our level of employee engagement and their overall work experience
3. To shape our culture, implement change, and hold leaders accountable in their role as people managers

4. To understand, in a measurable way, how we are doing overall

Employee feedback is encouraged, valued and is always taken seriously. Feedback is kept confidential and, where possible, will be taken into consideration when creating policies and benchmarks.

7. BeFAIR – Support Inclusion of All

At Vantage, we are committed to cultivating an inclusive culture. Our goal is to create an environment where individuals are valued, respected, heard, and treated fairly, regardless of race, gender, national origin, sexual orientation, age, religion or any other distinguishing personal attribute.

By fostering a workplace that is FAIR—focused on **Belonging, Accessibility, Inclusion, and Respect**—we harness the unique perspectives, skills, and talents of our diverse team. These efforts enhance our organization and empower individuals to contribute their best, helping us adopt innovative practices that enrich our internal culture and impact externally.



8. Safety

Commitment to Safety: Vantage is committed to providing a Safe and Healthy work environment for everyone impacted by our operations. This includes staying prepared for evolving workplace hazards and maintaining compliance with all applicable laws and industry standards. Our ABCs of Safety—**Accountability, Belief, and Commitment**—guide everything we do.

Employee Accountability: Safety is everyone’s responsibility. Each of us is expected to stay aware of our surroundings, follow safe work practices, and take ownership of both personal safety and the safety of others. Safety incidents are preventable—and prevention starts with us. Staying safe is a team effort and a core commitment for us all.

Reporting Hazards: Employees who see unsafe conditions, behaviors, or violations of safety policy, must report them immediately through the appropriate channels. Timely reporting helps prevent injuries and keeps everyone safe. Retaliation for good faith reporting is never tolerated.

Proactive Participation: We expect employees to take an active role in Safety by attending training, speaking up with ideas for improvements, and supporting their team in building a stronger safety culture. Each employee's voice and actions make a difference.

Think Safe, Work Safe, Be Safe!

9. Equal Opportunity and Respecting Each Other at Work

9.1 Fairness, Respect and No Harassment – Ever!

At Vantage, we are committed to fairness, respect and equal opportunity for all employees and applicants. Employment decisions – such as hiring, promotion, transfer and compensation – are based on individual skills and merit without regard to race, color, gender, sexual orientation, religion, age, national origin, disability, citizenship status, marital status, genetic information, or any other protected characteristic under applicable law. Discrimination or harassment of any kind will not be tolerated. This includes not only the workplace but also any work-related setting such as virtual and in-person meetings, business trips or social events.

All employees share responsibility for maintaining a respectful environment. Supervisors have a heightened duty to act immediately on any observed or reported misconduct, regardless of reporting lines or setting. Harassment – whether verbal, physical, written, or digital – is strictly prohibited. This includes threats, intimidation, bullying, slurs, discriminatory remarks, and unwelcome sexual advances or conduct. Any behavior that demeans, embarrasses or targets someone based on gender, orientation or other protected status is unacceptable.

9.2 Workplace Civility

Vantage is made up of a diverse group of individuals who hold different views and beliefs. Regardless of the topic, any differences must be approached with professionalism and mutual respect. Disagreements or discussions on sensitive topics should be handled in a manner that reflects courtesy, civility, and the company's values. Inappropriate, disruptive or disrespectful behavior has no place in our workplace. Each of us is responsible for fostering a positive environment where all employees feel safe, valued and respected.

10. Ethics

10.1 Act Ethically and Obey the Law

Throughout Vantage, we are committed to conducting business ethically and in full compliance with the laws and regulations of all the countries in which we operate. We hold ourselves and our business partners to the highest standards of integrity and accountability. Vantage will not tolerate bribery, kickbacks, facilitation payments, or corruption of any kind, whether directly or indirectly through third parties. This Code is designed to guide employees in making ethical decisions and staying compliant, but it is the employee's responsibility to read and understand its contents, as well as all related company policies. Employees may be required to periodically acknowledge compliance with the Code and these policies.

10.2 Commitment to Human Rights

Vantage is unwavering in its commitment to human rights and will not condone or conduct business with companies that violate these fundamental principles. Specifically, we will not engage with organizations that:

- Exploit child labor
- Use forced labor or engage in human trafficking
- Employ physical punishment or other abusive practices to discipline workers

We expect all business partners to uphold these standards and comply with applicable laws and regulations that protect human rights. Any violations of these principles will result in immediate action, including termination of business relationships.

10.3 Positive Work Environment for All Employees

We are committed to providing a positive and supportive work environment for our employees. We recognize the importance of balancing professional responsibilities with personal well-being and are dedicated to fostering a culture that supports this balance.

We are dedicated to compensating our employees fairly and competitively, ensuring alignment with industry standards and local regulations.

10.4 Avoid Conflicts of Interest and Improper Influence

We are all expected to act in the company's best interests and avoid situations where personal interests could interfere or appear to interfere with our professional responsibilities. Conflicts of interest may arise from personal, financial, or family interests that influence decisions or actions at work. This includes outside employment, ownership in competing businesses, hiring or supervising relatives, or receiving personal benefits through the employee's role the company. Employees must never use their position or access to company information in a way that creates a conflict, damages Vantage's reputation, relationships, or assets, or results in personal financial gain. Additionally, employees are strictly prohibited from engaging in any activities that violate local, provincial, state, or federal laws in the jurisdictions where we operate.

If a conflict or potential conflict arises, it must be disclosed immediately to the employee's manager or HR. Transparency and proactive communication are essential to resolving most conflicts effectively. In some cases, reassignment or recusal from decisions may be necessary to protect the company's interests.

Gifts, entertainment, and business courtesies must always be modest, infrequent, legally permissible, and clearly tied to a legitimate business purpose. Cash or cash equivalents are strictly prohibited. Advance approval is required in two specific situations: when the value of a gift exceeds \$100 or when the exchange involves government officials, whether foreign or domestic, regardless of monetary value. No gift, favor, or entertainment should obligate or appear to obligate the recipient or create the appearance of improper influence. Employees must ensure that public disclosure of such exchanges would not embarrass Vantage or compromise company values.

When engaging in customer entertainment, meals, or social events, these opportunities should be used to build relationships, understand customer needs, and explore how Vantage can better support and grow with them. These interactions must never be treated as a quid pro quo—offering a meal or entertainment should never be tied to expecting business in return.

10.5 Compete Fairly and Protect Business Integrity

Vantage is committed to competing fairly and ethically in all markets. We strive to outperform competitors by offering superior products and services, never through illegal, unfair, or questionable practices. Employees must comply with all applicable anti-trust and competition laws, which prohibit activities such as bid rigging, price fixing, market division, boycotts, or exchanging commercially sensitive information with competitors.

Employees may interact with competitors from time to time, some of whom may also be customers. In all interactions, employees must act appropriately and never share, discuss, or hint at any information that could compromise Vantage or benefit a competitor, regardless of how insignificant the information may seem. Discussions about pricing, pricing strategies, or other competitively sensitive information with competitors are strictly prohibited, as they may violate anti-trust laws and Vantage's confidentiality policies.

Employees must avoid any agreements or discussions with competitors that could limit competition or trade. This includes formal or informal agreements about prices, production levels, inventory, sales territories, or customers. Employees must also refrain from actions that establish resale prices, restrict customer rights, or condition sales on agreements to purchase other products. Breaking these laws can result in civil or criminal penalties for both the company and individuals involved.

10.6 Vendor Relationships and Fair Purchasing

We are committed to maintaining ethical and transparent relationships with our vendors and ensuring fair purchasing practices. Relationships with vendors must be based on lawful and fair practices, as well as providing fair value to the company. Our approach to vendor relationships is guided by the following principles:

- Wherever possible, we aim to establish corporate-wide or regional supply agreements to ensure consistency, cost-effectiveness, and alignment with our business goals.
- We seek competitive bids from qualified suppliers to ensure fairness, transparency, and the best value for Vantage.
- Before engaging with a supplier, we confirm their financial and legal status to ensure they meet our standards for reliability and compliance.
- We verify that all suppliers meet our quality standards and provide goods and services that align with Vantage's requirements and expectations.
- All agreements with suppliers must include clearly stated terms and conditions. Invoices must accurately reflect the goods and services provided, ensuring transparency and accountability.
- Employees and known associates must avoid accepting favors, gifts, or engaging in reciprocal agreements with suppliers that could compromise their objectivity or create a conflict of interest. Any questions should be directed to the employee's supervisor or HR partner.

- Vantage will not engage with suppliers who engage in unlawful or unethical practices including but not limited to:
 - Practices that are unsafe or unethical as defined by applicable local laws and international standards.
 - Violate laws or regulations in the jurisdictions where they operate.
 - Act without integrity, fairness, and respect for human rights.

We understand the complexities of operating in a global environment and encourage employees to seek guidance from their supervisor for possible legal review if they have questions about supplier practices or compliance with this policy. By maintaining these standards, Vantage ensures that our supply chain reflects our commitment to integrity, fairness, and respect for human rights.

10.7 Respect Data Privacy

We are committed to handling the personal data of our employees, customers, and vendors with care, responsibility and in full compliance with applicable privacy laws and Vantage policies. Personal data must not be shared – internally or externally – unless there is a legitimate business need or a legal or regulatory requirement to do so. When disclosure is permitted, it must be done securely and in accordance with the company’s information security policies.

10.8 Use Discretion with Social Media and Public Communication

Vantage encourages responsible use of social media that aligns with the company’s values. When engaging online, employees must avoid disclosing confidential information and must not speak on behalf of Vantage without proper authorization. Personal opinions should always be clearly identified as the employee’s own, and caution should be exercised to ensure statements, responses, likes, or other interactions do not create the appearance of representing Vantage’s official position.

It is important to remember that even personal comments or interactions on topics unrelated to Vantage could be misconstrued as the company’s stance. Employees are accountable for their online activity, and any actions that negatively impact Vantage’s legitimate business interests may result in disciplinary action.

Employees must not post comments or “like” posts that are threatening or obscene or that discriminate or harass on the basis of race, gender, religion, or any other protected category. Also, employees may not post photos or videos depicting themselves violating any law or Vantage policy.

Only designated spokespersons are authorized to speak on behalf of the company in public forums including media inquiries, conferences or online platforms. Employees who are contacted by the media or asked to speak on behalf of the company must refer the request to the Vantage Communications team.

10.9 Obey Global Trade Laws

At Vantage, we are committed to understanding and complying with all applicable trade laws and regulations when conducting business globally. This includes the import and export of products, services, or technologies. We must exercise particular care in adhering to custom regulations, embargoes, anti-boycott restrictions, and trade sanctions. It is strictly prohibited to engage in business with any governments, entities, or individuals that are subject to sanctions by the U.S. Government or other jurisdictions where Vantage does business.

10.10 Protect the Environment

Vantage is committed to being responsible partners in the communities where we live and work. We will conduct all our operations in a manner that safeguards the natural environment, complies with all applicable environmental laws and regulations, prevents pollution, and continually improves our environmental performance.

11. Customer Solutions and Delivering Results

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.

Vantage is committed to delivering results and meeting ambitious targets in every economic environment. We hold ourselves to high standards of performance and integrity, both of which are essential in creating value for our employees, customers, vendors, and the communities where we operate. While we strive for business success, we will never compromise our integrity or core values to achieve it.

12. Strategic Support

12.1 Share Your Input and Stay Aligned

We encourage all employees to share their ideas and perspectives during the development of the company's integrated business strategies. The open exchange of ideas strengthens our planning process. However, once strategic decisions are made, it's essential that everyone aligns with the direction and works together to support successful execution.

Employees are expected to work just as hard – if not harder – at identifying solutions to problems as they do at identifying those problems.

Employees should approach any task as if what they do will be shared publicly on social media and only act in ways that would make Vantage proud of their conduct!

12.2 Protecting Company Assets and Confidential Information

At Vantage, protecting company assets and confidential information is essential to maintaining our success and reputation. 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 telephone systems. These assets must be used efficiently and only for business purposes, except for incidental personal use that does not interfere with business

operations. Any suspected fraud, theft, or misuse of company assets must be reported immediately to a manager or Human Resources for investigation.

Confidential information is one of our most valuable assets. This includes non-public information that could benefit competitors or harm Vantage, our employees, or our customers if disclosed. Examples include trade secrets, business and marketing plans, financial data, product designs, customer lists, pricing strategies, personnel data, and personally identifiable information (e.g., names, addresses, and social security numbers). Employees must take care to safeguard this information and ensure it is not disclosed without proper authorization. Confidential information should only be shared with those who have a legitimate business need to know and must never be discussed with outsiders or unauthorized individuals even within Vantage.

Employees must also avoid inadvertently disclosing confidential information. Materials containing sensitive information, such as memos, notebooks, and electronic devices, should be stored securely. Unauthorized posting or discussion of company information online, including in chat rooms or on social media, is strictly prohibited. All company communications, including emails and voicemails, are presumed confidential and should not be forwarded or shared outside of Vantage unless required for legitimate business purposes.

12.3 Intellectual Property and Respecting Third-Party Rights

Employees are responsible for protecting Vantage’s intellectual property, including trademarks, copyrights, patents, and trade secrets. This includes materials such as publications, training materials, software, and other works of authorship developed during employment. Any inventions, designs, or systems created while performing job responsibilities or using company resources are the property of Vantage to the extent permitted by law. Employees must ensure that these assets are safeguarded and used appropriately to support the company’s goals.

Similarly, Vantage respects the intellectual property rights of others and expects employees to do the same. Employees must not knowingly infringe on third-party intellectual property, such as using unlicensed software, copying materials without permission, or misusing proprietary information. Only properly licensed software and materials are permitted for use on company systems, and employees must ensure that any third-party intellectual property used in advertising, promotional materials, or other business activities is authorized.

Employees must not disclose confidential information or trade secrets belonging to third parties, such as former employers, to Vantage. Protecting the intellectual property and confidential information of others is critical to maintaining ethical business practices and avoiding legal risks.

12.4 Use Email and Internet Appropriately

Employees 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.

12.5 Maintain Proper Records and Controls

We are committed to maintaining accurate and reliable records to support the achievement of business objectives, safeguard assets, and ensure compliance with applicable laws and regulations. Financial and operational results must be reported accurately and timely in accordance with company

policies and regulatory standards such as GAAP. Employees are responsible for adhering to internal controls to ensure that all quality, safety, personnel, and financial records accurately reflect actual events and transactions. Records must be retained in accordance with applicable record retention laws and company policies, and only for as long as they are actively needed unless otherwise required by legal or business obligations. Records relevant to legal actions must not be destroyed or discarded without approval from legal counsel.

13. Charitable and Community Support

We are committed to being a good partner to the communities where we live and work. We believe in giving back and supporting initiatives that make a positive impact. Our charitable participation may include donations of cash or company resources, as well as sponsoring community projects or activities that may involve voluntary employee participation. Any contributions that are political in nature, including those to a political party, political candidate, or in support of legislation, must be approved by the Vantage CEO and CHRO.

We also encourage employees to pursue their own charitable activities, and support causes they are passionate about. However, employees should engage in these activities as private citizens and not as representatives of Vantage unless the activity is officially sponsored or endorsed by the company.

By supporting charitable contributions and community involvement, we aim to foster a culture of giving and strengthen the communities we serve.

14. Reporting

14.1 Report Improper Behavior

Employees who become aware of any illegal, unethical or inappropriate behavior – or observe violations of Vantage policies – are encouraged to report their concerns promptly. Employees may speak with their direct supervisor or another appropriate company representative. Suspected violations of the Code of Business Conduct, Information Security, Vantage Policies or any applicable laws or regulations should be reported as soon as possible to ensure timely resolution and to protect the integrity of our workplace. Reports will be investigated promptly, and confidentiality will be maintained to the fullest extent possible.

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

- The employee's supervisor
- Human Resources
- The Business Unit Leader
- The Vantage Leadership Team
- The Vantage Employee Confidential Reporting Hotline below is available round the clock every day. Employees can choose to identify themselves or remain anonymous:

Vantage Employee Confidential Reporting Hot Line: 1-800-395-0939

- Employees may also send a confidential note to the Vantage “Report an Issue” portal:

<https://reportanissue.com/vantage>

14.2 Never Retaliate for Good Faith Reporting

Employees who raise good faith concerns about potential violations of the Code of Business Conduct play a vital role in helping the company identify and address issues before they escalate. Retaliation of any kind against individuals who report concerns in good faith will not be tolerated. Good faith reports will never be used as a basis for disciplinary action.

Vantage employees who are involved in an internal investigation are required to cooperate fully in accordance with company policy.

14.3 Discipline for Violations

We are committed to conducting business the right way. Any violations of the *Vantage Code of Business Conduct* will result in corrective action, up to and including termination of employment depending on the severity of the infraction.

If the violation involves potential civil or criminal activity the individuals in question may be reported to appropriate authorities or civil action undertaken.

Revision History

Version	Date	Section(s) Revised	Description of Change	Author/Owner	Approval
1.0	02/13/26	N/A	Initial Policy Issuance	HR Policy & Compliance	CHRO