



# CODE OF CONDUCT

**FORTACO**

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# WELCOME TO OUR CODE OF CONDUCT

**As a trusted partner** in manufacturing technology we help our customers find new and more efficient solutions throughout their value chain, starting from R&D, design and engineering to final assembly. This allows our customers in the energy, construction, mining, material handling, agriculture and forest and other industries to focus on maximizing the value of their core business.

**We challenge** ourselves to solve problems faster and at a deeper level than our competitors. We have the right quality and the right price.

**Our vision** is to be the most desired and effective engineering partner of welded structures, cabins, assemblies and machining for manufacturers of demanding capital goods in Europe. We want to be the preferred partner for suppliers and preferred place to work. Our target is to be the industry benchmark for our customers and competitors.

**Our mission** is to create value added for our customers by reshaping the way things are produced. We want to shape the whole industry.

**Fortaco's reputation** is a key to our success in business and it all stems from our values: Respect, Speed and Simplicity. These values are the basis for this Code of Conduct, which guides us to pursue a profitable business in a responsible manner, including economic, social and environmental issues, in a number of different countries. Our Code of Conduct gives us guidance on how we treat others, conduct business and protect our corporate assets.

**Our goal** is to maintain the highest legal and ethical standards and to respect and value all our stakeholders. We pay close attention to various national and international laws and regulations that we are committed to comply with – this is how we avoid risks and make tomorrow better.

This Code of Conduct applies to Fortaco Group, its affiliated companies worldwide, including all their leaders and employees (all jointly “Fortaco”). Furthermore, Fortaco also applies this Code of Conduct to its business partners. Our behavior influences how well we perform and how we are perceived. In Fortaco, we expect everybody to comply with this Code of Conduct and its underlying policies, laws and regulations.

All employees with leadership duties are required to actively and purposefully promote a leadership culture that is in accordance with Fortaco’s values and the spirit of this Code of Conduct.

We promote the implementation of this Code of Conduct through training and communication to our employees and business partners and monitor its application internally.

Each employee is responsible for acting in accordance with this Code of Conduct. We also encourage our employees and stakeholders to raise any concerns they might have and to highlight examples of good practice. If there are any questions or doubts, please do not hesitate to ask.



**Lars Hellberg**  
President & CEO

## Treating people with respect and dignity

Fortaco respects human and labor rights, international standards defined by the United Nations Universal Declaration of Human Rights as well as the core conventions of International Labor Organisations. This Code of Conduct is based on these and other internationally recognized standards.

Fortaco strives to provide a safe and inspiring working environment to all employees. Respect is one of our values and we know that our employees are a key to our success. We aim to be an attractive employer, and develop and retain qualified and motivated people. Fortaco is committed to treating all employees fairly, impartially and equally. We aim to create a work environment where people are respected regardless of individual differences, talents or personal characteristics.

We respect the value of diversity, fair treatment and equal opportunity. We recruit, remunerate, develop and promote employees regardless of race, religion, political opinion, gender, age, ethnic or national origin, color, language, sexual orientation, marital or parental status, disability or any other characteristics protected by applicable laws.

Fortaco standards are in the framework of the applicable laws. We might, in our organization culture, apply even more stringent standards, but the very minimum is the legislative level.

We comply with all laws pertaining to freedom of association, privacy, collective bargaining, working time, wages and salaries, as well as laws prohibiting forced, compulsory and child labor and employment discrimination.

Fortaco has a zero tolerance policy for any form of abuse whether it is sexual, physical or mental, harassment, or bullying towards employees or business partners.

We also have zero tolerance for opening, downloading or passing on indecent or abusive material, or for using the email or other communications tools and internet in any intimidating or disrespectful way.

Fortaco recognizes the fundamental right to freedom of expression in an appropriate and respectful way based on the national laws and regulations. However, when participating as an individual in e.g. political activities, it shall be made clear that the personal opinions and views expressed are personal, and do not represent those of Fortaco.

## Protecting health and safety

In Fortaco, all employees are required to conduct their duties without endangering the safety of themselves, colleagues, work site or community. Everyone's behavior contributes to an incident and injury-free workplace. We identify health and safety risks continuously and act proactively to prevent such risks. For instance, employees are not allowed to work under the influence of drugs or alcohol. They are also prohibited from bringing weapons and illegal drugs onto the work site.

Each employee is responsible for following the safety instructions and immediately reporting any shortcomings regarding safety instruction or protection measures.

## **Running a fair business**

Fortaco wants to grow the business with its customers while developing new opportunities and apply value-adding innovations that also benefit our customers. We know what our customers need, and we do what is required to deliver what the customer wants. We do not accept defects. We strive to be easy to reach, the obvious choice within our industry, and aim to deliver reliable customer orders on time.

In Fortaco, all work is done solely in the best interest of Fortaco, and free from any conflict of interest. We should avoid anything causing potential conflict situations. Fortaco employees are expected to promote the interest of Fortaco, and in doing so act responsibly. Fortaco employees are prohibited from taking personal benefits from opportunities discovered through the use of a corporate position or information. Our employees must avoid activities which lead to a conflict of interest. We use OECD's Convention on Combating Bribery of Foreign Officials in International Business Transactions and Commentaries as the basis for our Code of Conduct.

Fortaco competes fairly and avoids situations where our private interests may conflict with the interests of Fortaco. Fortaco's employees and management ban improper payments, any form of extortion or corruption, bribes and facilitation payments to or from Fortaco.

Fortaco operates in compliance with anti-money laundering laws, prevention of tax evasion, and cooperates only with suppliers and business partners that follow all applicable laws and Fortaco's requirements.

Fortaco does not tolerate any fraudulent behavior or activities such as fraud or theft.

Fortaco recognizes that all individuals have the right to work for the organization. In a case where family members, close personal friends of employees, or management are in the same organization, Fortaco will avoid to the extent possible, work situations that create a direct reporting relationship between family members or personal friends of individuals.

## **Minimizing environmental impacts**

Fortaco is committed to conducting its business in an environmentally sustainable way. We know our impact on the environment. We use materials and resources efficiently and minimize any harmful effects of our operations on the environment. We contribute to global sustainability by developing, promoting and utilizing resource-efficient and environmentally friendly materials and services.

## **Working with political decision makers and civil servants**

Fortaco maintains constructive co-operation with authorities and regulatory bodies nationally and internationally. We aim to make a positive contribution to the sustainable development of the communities in which we work. Fortaco complies with the applicable laws and regulations related to the interaction with civil servants and political decision makers, including lobbying.

Fortaco does not support, directly or indirectly, any political parties, individual politicians or other political organizations or finance any election campaigns.

## **Cooperating with suppliers**

Corporate responsibility is an integral part of Fortaco's supply chain management. We aim to develop relationships based on honesty, fairness and mutual trust throughout our supply chain. The structure of any business dealings with Fortaco must be transparent. Fortaco has procedures to screen, approve and audit business partners in place as part of our Supplier development.

This Code of Conduct sets forth the foundation for all interactions. We expect our suppliers to comply with all applicable laws and regulations and to follow the same good business conduct that we follow. In our supply chain, we also encourage our suppliers to set forth similar requirements for their suppliers and to take responsible business behavior upstream in the entire supply chain.

## **Giving and getting gifts and entertainment**

In Fortaco, we do not accept or give gifts that go beyond what is considered reasonable hospitality in the ordinary course of business. Participation in an external event organized by a supplier or other business partner is acceptable, provided that there is a sound and documented business reason for the participation. In such cases, the travel and accommodation expenses are covered by Fortaco.

## **Protecting our assets and resources**

All Fortaco's assets and resources are assigned to Fortaco's business objectives to ensure our long-term success. Fortaco's assets, including intangible assets, consisting of but not limited to, intellectual property (whether registered or not), such as trademarks, and trade secrets; and tangible assets, including but not limited to resources, facilities, equipment, and buildings, are meant for business purposes, and they should never be used for any unlawful, non-compliant or unethical purposes. The same applies to any property entrusted to care by our business partners.

For the aforementioned stated purpose, Fortaco actively seeks to protect its intellectual properties, and all items falling thereunder, such as relevant inventions, ideas, concepts and alike, either by means of registering or by maintaining them as trade secrets, and by reacting to possible infringements that have arisen or come to Fortaco's information.

Fortaco also acts, to the best of its knowledge and ability, in a manner in order not to infringe third parties' intellectual property rights.

All employees are expected to take proper care of Fortaco's assets, use them efficiently and not to use them or permit anyone to use them for any unauthorized purposes.

## **Keeping information confidential**

Fortaco has profound industrial understanding and highly specialized engineering competencies. In Fortaco, we protect the confidentiality of our own and our business partners' trade secrets and other confidential business-related information that comes to our knowledge in the course of our operations. We never disclose or discuss with any stakeholder or party other parties, such as business partners' businesses, projects or any other confidential information. Fortaco and each of its employees, directors and stakeholders must comply with strict confidentiality obligations. On the one part, Fortaco never discloses its trade secrets or other confidential information to any outside party. On the other part, Fortaco protects its customers' and other stakeholders' confidential information as its own.

We must understand in all cases which information is defined to be confidential information and without an express definition or notice, we must understand from the nature of the information that such information must be treated as confidential information. For example, a mere existence of certain customer relationships may be confidential. Furthermore, for any reference use purposes, we must in each and every case expressly request the customer's consent in writing.

Fortaco may use confidential information only to the defined purpose and disclose it to the authorized recipients only. Please note that in some cases you may not disclose some information even to all of your Fortaco colleagues or even to your superior. For any doubts, please contact the person who informed you of the confidentiality obligation in question.

Please note that any unauthorized disclosure or usage of confidential information may lead to loss of business, loss of customers, liquidated damages, compensations for damages, and we might not be able to recover the stakeholders' trust thereafter. Any unauthorized use or disclosure of confidential information is prohibited without exception.

## **Communicating transparently**

Fortaco wants to protect customers' reputation and build the Fortaco brand. Our relationships and communication shall be honest, fact-based, accurate and transparent within the bounds of commercial confidentiality. Fortaco presents its services and other activities truthfully in all marketing and communication means and materials, and complies with the applicable laws, regulations and guidelines related to responsible marketing communications.

## **Whistleblowing**

All potential violations to the Code of Conduct should be prevented. However, if a violation does occur, the incident must be reported through the provided channels in a timely manner. Managers are responsible for informing employees about these channels.

If you suspect that this Code of Conduct has been violated, please report the misconduct by contacting your immediate superior, any member of local leadership teams or internal audit function. Concerns and issues are addressed confidentially and anonymously.

All compliance concerns are reviewed in accordance with the established process. All allegations of potential violations of the Code of Conduct that are made in good faith will receive a fair and comprehensive investigation. Acts that are inconsistent with the Code of Conduct must be promptly corrected and are subject to disciplinary actions in accordance with the applicable legislation. Criminal violations may also lead to prosecution proceedings.



# FORTACO

**Fortaco** is the leading brand independent strategic partner to the heavy off-highway equipment and marine industries offering technology, vehicle cabins, steel fabrications and assemblies.

**Fortaco Group** has operations in multiple European Business Sites and Technology Hubs, which are supporting our global customers. We benchmark ourselves to the automotive industry and standards to secure maximized value add for our customers as a true Tier 0.5 partner. We have the right quality, the right delivery accuracy and the right price.

**Together** we want to reshape the way things are produced.