



CODE OF CONDUCT

FORTACO

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FORTACO CODE OF CONDUCT

Fortaco is the leading full-solution provider for OEMs (Original Equipment Manufacturers) in the off-highway machine industries. Pioneering the design and production of assemblies, cabins, steel fabrications, and zero-emission solutions, we offer cutting-edge technology for enhanced productivity.

Collaborating with industry-leading OEMs, we specialize in full-lifecycle solutions from research and technology to the design and production of their components and machines. Fortaco's innovative technologies extend to lightweight design, ensuring efficiency without compromising on durability and functionality. We help our customers find new and more efficient solutions throughout their value chain.

Our top priorities are safety, quality, and delivery accuracy.

We have a mindset of continuous improvement, and we are dedicated to operational excellence. We want to create value added for our customers by reshaping the way things are produced. Our target is to be the industry benchmark both for our customers and competitors.

Fortaco's reputation is the foundation for our success, and it stems from our values: Respect, Simplicity, and Speed. Our values are the basis for Fortaco's Code of Conduct, which guides us as we pursue 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 other people, conduct business, and protect our corporate assets.

We maintain the highest legal and ethical standards and respect and value all our stakeholders. We pay close attention to the national and international laws and regulations that we are committed to comply with – this is how we avoid risks and make tomorrow safer and better. We create long-term value by upholding legal compliance and ethical standards.

This Code of Conduct applies to Fortaco Group, its affiliated companies worldwide, including their leaders and employees (all jointly “Fortaco”). Furthermore, Fortaco applies this Code of Conduct to its business partners. Our behavior defines us and how we are perceived. At Fortaco, we expect everyone 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 may have and to highlight examples of best practices. If there are any questions, do not hesitate to ask.



Mika Mahlberg
President & CEO



Treating people with respect and dignity

Fortaco respects human rights and labor rights, international standards defined by the UN Guiding Principles on Business & Human Rights, the OECD's Guidelines for Multinational Enterprises, as well as the core conventions of international labor organizations, such as the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. This Code of Conduct is based on these and other internationally recognized standards.

Fortaco strives to provide a safe and inspiring working environment for all employees. Respect is one of our values, and we know that our employees are 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 train our employees to identify unacceptable situations and speak up and report them.

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

We are dedicated to promoting gender equality throughout the organization. This includes equal access to employment, leadership development, promotions, and equal pay for equal work. We support work-life balance through inclusive work-life policies and flexible working arrangements wherever feasible.

Fortaco also respects the rights of minorities and indigenous peoples. We support the protection of their cultural heritage, traditions, and connection to land. We are committed to ensuring that our operations and supply chains do not negatively affect these communities.

Fortaco standards are within the framework of applicable laws. We might, in our organization's culture, apply even more stringent standards, but the very minimum is the legal compliance 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 sexual, physical, mental, harassment, or bullying of employees or business partners. We respect our colleagues and treat them as we would like to be treated ourselves. We also speak up if we experience or observe discrimination, harassment, or other inappropriate behavior.

We also have zero tolerance for opening, downloading, or passing on indecent or abusive material, or for using email or other communication tools and the 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, for example, political activities, it shall be made clear that personal opinions and views expressed are personal and do not represent those of Fortaco.

Protecting health and safety

At Fortaco, all employees are required to perform their duties without endangering their own safety or that of their colleagues, the work site, or community. Everyone's behavior contributes to an incident and injury-free workplace. We identify health and safety risks constantly and act proactively to prevent such risks. Employees are expected to wear personal protective equipment appropriate for their work and are not allowed to work under the influence of drugs or alcohol.

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

Minimizing environmental impacts

Fortaco is committed to conducting its business in an environmentally sustainable way. This means we are committed to mitigating adverse impacts on the environment, and we acknowledge the need to continuously improve the environmental performance of our offerings, operations, and raw material sourcing. We use materials and resources efficiently and minimize any harmful effects of our operations on the environment. Fortaco contributes to global sustainability by developing, promoting, and utilizing resource-efficient and environmentally friendly materials and services. The UN Global Compact and Sustainable Development Goals is used as the basis for our Code of Conduct.

At Fortaco, we report possible environmental incidents promptly and take appropriate actions to remedy and learn from those situations. We also transparently report on how our activities impact the climate and the environment.

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. As part of our supplier development program, Fortaco has procedures in place to screen, approve, and audit business partners.

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 adhere to good business conduct. In our supply chain, we also encourage our suppliers to set forth similar requirements for their suppliers and to practice responsible business behavior through the entire supply chain.

Keeping accurate and complete records

Fortaco strives to safeguard the integrity and transparency of its business records. This includes both financial and non-financial records, such as financial statements, expenditures, records containing personal data, safety and environmental records, product information, and accounting source documents.

We maintain accurate and complete records which are well maintained and in compliance with applicable laws, regulations, and standards. Business records

are prepared in a timely and fact-based manner which reflects our business dealings. We maintain appropriate controls to secure the accuracy and completeness of our business records.

Protecting our assets

Assets can be tangible or intangible. Tangible assets include, for example, real estate, buildings, raw materials, machines, and products. Examples of intangible assets are brands, trademarks, patents, copyright, knowhow, data, and trade secrets.

Fortaco's assets are dedicated to helping us to succeed in the long run. We protect our assets from damage, misuse, loss, fraud, theft, and criminal acts. We also comply with policies, processes, and controls designed to safeguard our assets. We use Fortaco's assets only for business purposes, unless otherwise authorized by relevant management. We never use our assets for personal gain or in a manner contrary to our policies, processes, and controls, or for illegal activities.

We also avoid using counterfeit materials and unauthorized use of third parties' assets. To protect the integrity of our products and operations, we source only from approved and verified suppliers and strive toward full traceability of components.

Protecting confidential information

Fortaco has global operations and an organization which is present in multiple countries. We also have a profound understanding of industry and highly specialized engineering competencies. We are committed to protecting both personal data and business-critical information. Confidential information is available only to those persons who have a valid need for it.

We must always understand what information is confidential. Personal data means any information of a recognizable individual. Business-critical information may pertain to business plans, strategies, mergers and acquisitions, inside information, sourcing information, intellectual property, research and development, customer related information, and financial information.

Personal data is handled responsibly and in compliance with applicable laws and regulations in countries where we operate. We handle all information with caution and take necessary measures to ensure the protection of business-critical information. Unauthorized use or disclosure of personal or business-critical information may cause significant harm to our business and reputation, as well as to individuals whose personal data we are responsible for safeguarding.

We also comply with applicable laws and regulations with respect to inside information.





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Respecting competition laws

We consider free competition as a driver of efficiency and innovation, which is in the best interest of Fortaco and all our stakeholders. We are committed to compliance with applicable competition laws, such as laws prohibiting anti-competitive agreements and the practice and abuse of dominant market positions.

We are especially cautious in our relations to competitors. Our employees are trained to ensure that they are knowledgeable regarding competition law and able to identify situations where competition law considerations are relevant.

Trade compliance and anti-money laundering

We deliver products and services worldwide and are committed to responsible trade. Fortaco complies with applicable national and international laws and regulations on export control, sanctions, customs and anti-money laundering. When importing and exporting products, services and technology (including software), we follow the rules regarding customs and export control, such as export control classifications and licenses.

We also monitor and comply with sanctions applicable to specific individuals, entities, and countries.

Fortaco's business operations relating to international trade are regularly assessed to ensure trade compliance.

Zero tolerance for bribery and corruption

We are committed to a high level of integrity and have zero tolerance for all forms of bribery and corruption. Any benefit which is of value to its recipient may be considered bribery or corruption, whether offered or accepted directly, indirectly, or through third parties.

Fortaco applies specific rules and procedures for offering and accepting gifts, hospitality and any other form of benefits. Benefits must be offered and accepted in a transparent manner and the value of a benefit must be reasonable. No benefit shall create dependency or influence decision-making.

We are particularly cautious when dealing with public officials and representatives of business partners who possess decision-making power which may be considered to be influenced by a benefit.

We make decisions in the best interest of Fortaco and avoid situations where our employees' personal interest may conflict with Fortaco's interest.

Whistleblowing - Speak up!

Fortaco encourages a speak-up culture which enables us to ask questions and raise concerns without fear of retaliation. Suspicions and concerns about misconduct which violate Fortaco's Code of Conduct, policies or applicable laws or regulations must be reported.

Employees are expected to discuss any concerns directly with their immediate superior or any member of the local leadership team. Managers are responsible for informing employees about these channels.

In the case employees are not comfortable discussing with their management, or in the case of concerns raised by stakeholders other than our employees, we offer the option of submitting reports anonymously, in the employee's native language, through a secure online whistleblowing channel.

All reports submitted to the whistleblowing channel are accessed and assessed by a dedicated whistleblowing team, and investigations are conducted if necessary. All reports are handled in compliance with applicable laws, and there will be no retribution or punishment for any person who reports a suspected violation in good faith.

Criminal violations may also lead to prosecution and criminal sanctions.

Communicating transparently

In relation to our stakeholders, we cooperate and communicate in an honest, fact-based, accurate, and transparent manner according to applicable laws and regulations. Fortaco maintains constructive cooperation with authorities and regulatory bodies.

We aim to make a positive contribution to the sustainable development of the communities in which we work. Fortaco does not support, directly or indirectly, any political parties, individual politicians, other political organizations, or finance any election campaigns.

Fortaco is the leading full-solution provider for OEMs in the off-highway equipment industries. Pioneering the design and production of assemblies, cabins, steel fabrications, and zero emission solutions, we offer cutting-edge technology for enhanced productivity. We empower off-highway machines to use fossil-free steel and our customers to optimize their operations and move towards a greener future.

Collaborating with industry-leading OEMs, we specialize in full lifecycle solutions from research and technology to the design and production of their components and machines. Our innovative technologies extend to lightweight design, ensuring efficiency without compromising on durability and functionality.

We have operations in multiple business sites which enable flexible and reliable support for our customers.