

1. INTRODUCTION

The Board of Directors and the Group Management of forteq Group have issued this Code of Conduct to lay down forteq's standards of ethical practice.

We want to be a responsible corporate citizen; compliant with the principles set forth in this Code of Conduct is therefore vital.

We will:

- adhere to the applicable laws;
- conform with the locally accepted standards and good corporate citizenship in each country in which we do business;
- apply internal procedures; and
- promote and sustain a working environment that fosters mutual respect, openness and personal integrity.

All persons working at forteq (managers and employees) or acting on behalf of forteq (such as consultants, external employees, suppliers, subcontractors) are obliged to comply with these principles within the scope of their respective tasks and areas of responsibility.

2. RECORD-KEEPING

We keep all records that are to be maintained according to legal requirements and best business practice. This applies to all aspects of our business. We do not engage in inaccurate, false or misleading record-keeping.

3. ANTITRUST

We welcome free business activity and will compete fairly within the framework of applicable competition and antitrust laws.

All employees shall abide by all applicable antitrust laws, regardless of whether they are enacted by a supranational, national or local body. Furthermore, employees shall not engage in any anti-competitive practices such as illegal price fixing, market-sharing or other activities which prevent, restrict or distort competition in violation of the applicable antitrust laws.

4. CONFLICTS OF INTEREST

We give our company our full commitment and loyalty. We avoid any conflict of interest - or even the appearance of such a conflict - which might arise where our own personal or financial activities might interfere with our objectivity and loyalty to the Company. We do not participate personally and actively in any business that competes directly and/or indirectly with forteq. The acceptance and performance of a business-related assignment for a third party, or the acceptance of a compensated secondary job, requires the express prior consent of the employee's line manager.

Nevertheless, should a conflict of interest arise members of the management or employees who find themselves in a conflict of interest are obliged to inform the relevant corporate bodies without delay.

Examples of potential conflicts involving employees:

- contracting with a supplier managed by a close friend or family member;
- working independently as a consultant to a supplier or customer;
- having a private business performing work that is similar to work that the employee performs at our Company or that we might be interested in performing.

5. HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION

We consider safety and the protection of human life and the environment as a primary goal in our activities and processes. We are committed to design our processes and services in line with industry standards with respect to safety, health and environmental requirements.

We are committed to take action for the protection of our employees, the public and the environment in co-operation with public authorities.

With our products, solutions and processes we want to make a significant contribution to reduce environmental impacts along the entire value chain and actively promote climate protection.

6. EMPLOYEMENT ISSUES

forteq employees may expect the Company to fulfil its responsibilities as an employer in a timely and correct manner, and we expect our employees to perform to the best of their abilities and in compliance with the following rules:

- local occupational safety and health regulations must be respected. If no local standards have been determined, best international practice principles shall apply;
- access to employment and promotion is based on personal skills and abilities, not on gender, race or other discriminatory factors;
- fair remuneration for regular working hours and overtime as well as benefits, at least equal to the minimum wage established under the applicable law;
- legal regulations on working hours and sufficient resting periods including holidays are respected;
- employee/management communication is encouraged;
- no forced or child labour is used;
- forteq shall protect the psychological and physical integrity of its employees and respect their personality.

The possession, distribution and use of illegal drugs during working hours and on Company premises is prohibited.

All employees must comply strictly with the rules regarding sexual harassment that are in force in their countries of work.

Employees should have a safe work place. Workplace violence, including threats, threatening behaviour, harassment, intimidation, assaults and similar conduct will not be tolerated. Firearms are not permitted on any forteq facility without the prior written approval of the senior management of the legal entity concerned.

7. DATA SECURITY AND DATA PROTECTION

forteq Group is aware about importance of Data Protection System and Security and builds its System in accordance to the TISAX Requirements.

8. GIFTS AND IMPROPER PAYMENTS

We avoid accepting or providing gifts, gratuities and entertainment from or to others that might rise to a conflict of interest or violate the law. We comply with all legal requirements and all restrictions dictated by ethical business standards. In offering the usual gifts, gratuities and entertainment to others we comply with the law and do not violate the standards of those with whom we are dealing.

9. INTERNATIONAL TRADE RESTRICTIONS AND BOYCOTTS

The ability of our Company to trade in the world market is restricted by regulations issued by various countries and international organizations such as the United Nations. It is the policy of forteq to comply fully with the prohibitions and requirements of all international trade laws and regulations. All employees involved in these areas must be familiar with the laws and regulations affecting business conduct in the countries in which forteq operates.

10. CONFIDENTIALITY/DISCLOSURE OF COMPANY-RELATED INFORMATION, CONTACT WITH MEDIA

We always treat sensitive data and information as confidential. We consider any kind of person-related data, business and operating secrets (whether ours or those of third parties), financial data and information that is of confidential nature as sensitive information. We shall only disclose such information to third parties when authorized in advance to do so and only if the recipient is equally bound to maintain confidentiality. We are cooperative and transparent when dealing with the authorities.

Some examples of confidential information:

- a) technical information about current or planned products and/or processes;
- b) procurement plans, vendor lists and purchase prices;
- c) cost, pricing, marketing and service strategies;
- d) non-public earnings reports and other financial reports;
- e) information relating to divestitures, mergers and acquisitions.

Any contact with the media is strictly limited to persons who are specifically authorized in this respect.

11. DISCIPLINARY PROCEEDINGS AND PENALTIES.

Violation of the provisions/regulations of this Code or omission of the conduct prescribed in the Code may result in failure to fulfill the obligations of the employment relationship. The possible consequences and the level of penalties shall depend on the severity of the violation in accordance with the applicable legal provisions and any existing collective agreements, also with regard to the continuation of the employment relationship and any claims for damages.

The same applies to Suppliers, Business Partners, Contractors with regard to non-compliance with the provisions of this Code of Conduct.

12. REPORTING MISCONDUCT

forteq takes all misconduct very seriously, regardless of whether it is committed by employees or by clients, suppliers, contractors or other agents.

forteq therefore encourages all employees to report – in good faith – any misconduct of which they become aware in the course of their employment or otherwise connected to their employment.

As part of the general control system all forteq employees are required to support compliance with the Code of Conduct and report any violations.

After each report the supervisory body will initiate internal investigations to verify and control the violation.

In any case, if disciplinary proceedings are initiated against a reported employee, the employee shall have the right to defend himself/herself within a reasonable period of time and has the right to a hearing before the disciplinary body.

A report shall concern any act or omission on the part of employees that could involve the following:

- a) Criminal offense;
- b) Failure to comply with legal obligations;
- c) Danger to the health and safety of others;
- d) Environmental damage;
- e) Inaccurate accounting or violation of financial control procedures;
- f) Any serious violation of the rules provided in this Code of Conduct;
- g) Any violation or suspected violation of the operational requirements relevant to the organizational model;
- h) Concealment or elimination of information regarding reports.

Instead of reporting a concern to their direct superior, or if they have reported a concern and feel that it has not been properly acted upon, employees may make a report to any of the following:

- Anton Affentranger, Chairman of the Board
e-mail: aa@aasa.com

- Daniel Keist, Member of the Board of Directors
e-mail: daniel_keist@outlook.com

Employees may also communicate anonymously if they prefer.

13. FINAL REMARKS

It is the responsibility of all managers to make sure that all forteq employees are familiar with the rules of this Code.

We are dedicated to building our relationships on a basis of trust. However, we will not shy away from taking appropriate action if we should realize that compliance with this Code is not supported in full.

This Code comes into force as of July 14, 2023



Anton Affentranger
Chairman of the Board



Lucie Toscani
Chief Executive Officer