



**FMW**  
INDUSTRIES  
Engineers of progress

# CODE OF CONDUCT



Pulp



Paper



Energy



Recycling



Chipboard



Other

From the content - what we are committed to:

I. Preamble ..... 3
1. Product safety and liability ..... 4
We guarantee maximum product safety and comply with all relevant safety regulations ..... 4
2. Care in the supply chain & respect for human rights ..... 4
We are committed to maintaining the highest standards of care and integrity to ensure that our products and services are produced under fair, safe and respectful conditions ..... 4
3. Environmental protection & sustainability ..... 5
We protect the environment and promote sustainable practices to minimize our ecological footprint and help shape a responsible future ..... 5
4. Export controls & sanctions ..... 5
We comply with all export control laws and avoid business relationships with sanctioned parties ..... 5
5. Data protection & IT-security ..... 6
We protect personal data and work with the highest IT security standards ..... 6
6. Competition law & antitrust law ..... 6
We promote fair and free competition and see this as the basis for a dynamic and innovative economy ..... 6
7. Corruption & Bribery ..... 6
We strictly reject corruption & bribery ..... 6
8. Tax law & financial regulations ..... 7
We ensure transparency and comply with all tax and financial regulations ..... 7
9. Labor law & occupational safety ..... 8
Creating a healthy and safe working environment and thus contributing to a positive and productive working atmosphere is our ongoing endeavor ..... 8
II. Scopy of validity ..... 9
III. Reporting & cooperation obligations ..... 9

We are guided not only by local laws and practices but also by the basic principles and rights of

- 10 Principles of the des Global Compact (https://unglobalcompact.org/what-is-gc/mission/principles)
• Rio Declaration on Environment and Development (https://www.un.org/en/development/desa/population/migration/generalassembly/docs/globalcompact/A\_CONF.151\_26\_Vol.I\_Declaration.pdf)
• ILO International labor standards (https://www.ilo.org/international-labour-standards)
• Universal Declaration of Human Rights (https://www.un.org/en/about-us/universal-declaration-of-human-rights)

## I. Preamble

..... from the task to success, together with FMW..

FMW offers flexible and customized solutions to best meet the needs of our international customers. We stand for innovation, know-how, flexibility and quality. Our Code of Conduct forms the basis for our actions and reflects our commitment to integrity, responsibility and ethical behavior in all aspects of our business activities. We are committed to the highest standards of compliance, fairness and respect towards our customers, business partners, employees and society. Every employee has a responsibility to live these principles in their daily work.

**Innovation leadership:** We live our company slogan “Engineers of Progress“

**Sustainable profitability:** based on our uncompromising demand for the best employees, the best product quality, the best services, the best technology, coupled with operational and organizational excellence.

**Professional responsibility:** safety and functional reliability are our top priority, but the environment and its protection also deserve our full attention

**Long-term partnership:** Our progress is also your progress. We believe in a strong, fruitful partnership and mutual growth.

**Our employees are at the heart of our success.** We are convinced that our company is only as strong as the people who shape it. That's why we are committed to creating a supportive, respectful and nurturing work environment where every employee can reach their full potential. We believe in the power of collaboration and the exchange of ideas. A strong team that works together and supports each other is the key to our shared success.

This Code serves as a guide for our decisions and actions and is designed to ensure that we fulfill our business commitments in a transparent and responsible manner.

We are your **Engineers of progress**



(from left to right): Managing Director Martin Größ and Franz Zeilinger  
Managing Partner Felix Sorger

## 1. Product safety and liability

We guarantee maximum product safety and comply with all relevant safety regulations

Product safety is one of our cornerstones for successful projects and satisfied customers. By adhering to these principles, we not only protect our customers, but also the reputation and integrity of our company

- We strictly adhere to the national and international safety guidelines and standards (Machinery Directive, standards, etc.).
- Our products are subject to comprehensive quality controls in order to meet the specified safety requirements.
- We promote a culture of continuous improvement in order to constantly optimize the safety of our products
- We continuously train our employees in the application of standards and safety-related topics, and external expert opinions help us to continually raise our safety standards.
- At FMW, product compliance begins in the pre-project phase and accompanies the order right through to the handover of the system to the customer.



## 2. Care in the supply chain & respect for human rights

We are committed to maintaining the highest standards of care and integrity to ensure that our products and services are produced under fair, safe and respectful conditions

- We select our suppliers carefully and evaluate them at regular intervals to ensure that our suppliers meet our standards for quality, ethics and sustainability.
- We strive for complete transparency in our supply chain and ensure that all steps from the procurement of raw materials to the delivery of the end product are traceable.
- We require our suppliers to adhere to our Code of Conduct and to demand the same from their subcontractors.
- We respect and promote human rights and are committed to equal opportunities for all and regard diversity as a strength and driving force for new innovations. We do not tolerate any form of discrimination, in particular on the basis of gender, ethnicity, religion, age, disability, sexual orientation, national origin, ideology or other characteristics that are protected by law.
- Forced labor, child labor and other forms of exploitation are strictly prohibited.



### 3. Environmental protection & sustainability

We protect the environment and promote sustainable practices to minimize our ecological footprint and help shape a responsible future

For us, environmental protection and sustainability are more than just fulfilling legal requirements. As a global company, we see it as our responsibility to keep the ecological impact of our business activities as low as possible. Our aim is to create positive added value for the environment and society through sustainable products:

- We are committed to complying with all environmental laws and regulations.
- We minimize our environmental emissions through efficient use of resources, waste reduction and emissions control.
- We promote recycling and the reuse of materials to reduce waste.
- We invest in environmentally friendly technologies and processes to continuously reduce our environmental footprint.



### 4. Export controls & sanctions

We comply with all export control laws and avoid business relationships with sanctioned parties

Our aim is to ensure that all international business transactions are carried out in accordance with applicable national and international laws and regulations. We aim to achieve this goal through strict export controls:

- Before exporting goods, technologies or services, we carefully check whether the applicable permits and licenses have been obtained and carefully record all relevant documents and evidence in connection with export controls and sanctions.
- We regularly check whether our business partners, customers and end users are on sanctions lists or located in countries affected by international sanctions.
- We carefully document all relevant export transactions and licenses to ensure transparency and traceability.





## 5. Data protection & IT-security

We protect personal data and work with the highest IT security standards

Our commitment to data protection and IT security is crucial for the protection of our data, that of our customers and partners and for maintaining trust in our business activities.

- We comply with all applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR) and other relevant laws.
- We collect, process and store personal data only in accordance with legal requirements and established privacy policies.
- We take appropriate technical and organizational measures to protect personal and business data from unauthorized access, loss or misuse.
- We implement IT security measures to protect our systems and networks from cyber attacks and other security threats.
- Regular security updates and antivirus software are used to minimize potential security risks.
- We promote awareness of security-conscious behavior, including the secure handling of passwords and the avoidance of phishing attacks.
- +We regularly review and update our data protection and IT security practices to ensure that they comply with the latest standards and take current threats into account.



## 6. Competition law & antitrust law

We promote fair and free competition and see this as the basis for a dynamic and innovative economy

This is the only way companies can compete in a fair environment:

- We always act in accordance with the principles of free and fair competition and avoid practices that may distort the market or unlawfully disadvantage competitors
- Price fixing, market sharing or other anti-competitive practices are strictly prohibited.
- Our marketing and sales activities are carried out on a fair basis and in compliance with competition law, without unfair practices or the abuse of dominant market positions.
- We avoid situations in which personal interests or relationships could influence fair competition or our business decisions.

## 7. Corruption & Bribery

We strictly reject corruption & bribery.

The fight against corruption and bribery is a central element of our ethical principles and for maintaining our good reputation and the trustworthiness of our business relationships. Every employee has a responsibility to respect and implement these principles in their daily work and to ensure that we always act ethically and in accordance with the law:

- We have a strict zero-tolerance policy towards corruption and bribery and we comply with all applicable national and international anti-corruption laws and regulations.
- All business transactions and business expenses are openly and accurately documented
- Gifts, donations or other benefits that could give the impression of influence are not accepted or offered.
- Any donations/sponsorships are made on a voluntary basis without expectation of anything in return.
- We encourage our employees to report suspicious activities or possible violations of these guidelines immediately, see Section III. Reporting and cooperation obligations.



## 8. Tax law & financial regulations

We ensure transparency and comply with all tax and financial regulations

Our commitment to tax and financial compliance is critical to our reputation and the sustainable success of the company:

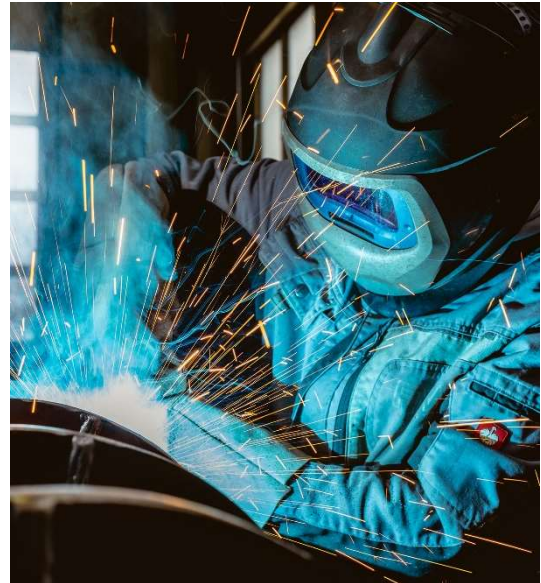
- We comply with all applicable national and international tax laws and regulations.
- We keep all financial transactions and accounting records accurately and properly.
- Our annual reports and financial statements comply with recognized European accounting standards and are regularly audited.
- We firmly reject any form of tax evasion or manipulation.
- We carry out regular internal and external audits to ensure compliance with tax and financial regulations.
- Our employees receive regular training on the relevant tax and financial regulations to ensure that they have up-to-date knowledge and requirements.
- We do not tolerate money laundering and make every effort to prevent such activities. In this context, our employees are sensitized to report unusual or suspicious occurrences.

## 9. Labor law & occupational safety

Creating a healthy and safe working environment and thus contributing to a positive and productive working atmosphere is our ongoing endeavor.

The well-being and safety of our employees is very important to us, because our employees are our greatest resource:

- We strictly adhere to all applicable labor laws and regulations, including regulations on working hours, wages and working conditions.
- We are committed to complying with all relevant occupational health and safety regulations and create a safe working environment through regular instruction, training and risk assessments.
- We promote the physical and mental well-being of our employees through health promotion programs.
- We respect the right of employees to form employee representative bodies.
- We promote awareness of the importance of occupational health and safety and provide our employees with personal protective equipment and ensure that it is used properly and responsibly.
- We offer our employees ergonomic workplace equipment to minimize work-related health risks.
- The consumption of alcohol and drugs on company premises is strictly prohibited. Smoking is only permitted in specially designated areas.





## II. Scope of validity

This Code of Conduct applies to all employees and managers, but also to all persons who are attributable to FMW on the basis of another legal relationship (such as temporary workers, external specialists, representatives, etc.) regardless of their location or function. Furthermore, we expect our business partners, suppliers and contractors to respect and support our values and ethical standards.



The Code covers all business activities and decisions and serves as a guideline for our behavior inside and outside the company. Each individual is responsible for understanding this Code and applying it in their daily work to ensure that our actions are always in line with our core values and legal requirements.

This Code of Conduct is regularly reviewed to ensure that it is up to date and amended if necessary.

## III. Reporting & cooperation obligations

By complying with the Whistleblower Protection Act (HSchG according to EU Directive 2019/1937) and supporting whistleblowers, we help to promote an ethical and legally impeccable working environment.

- Whistleblowers who in good faith report information about wrongdoing or illegal behavior are protected from any form of retaliation or discrimination.
- All reports are treated confidentially in order to protect the identity of the whistleblower and avoid possible negative consequences.
- Reported grievances are investigated thoroughly and independently. If the violation is confirmed, appropriate measures are taken to rectify the problem and prevent future violations.
- We provide safe and easily accessible channels for whistleblowing, including anonymous reporting options:

Contact:

- E-Mail to: [hinweis@fmw.co.at](mailto:hinweis@fmw.co.at)
- Mailbox in break room office II for anonymous messages (for employees)
- or contact our Head of Finance Mr. Martin Zoglauer, who is also responsible for the implementation of the HSchG.