



# **CODE OF ETHICAL CORPORATE CONDUCT FOR FKI**

**”WHAT WE PROMISE”**

## Introduction

At FKI A/S, we always strive to act with the highest degree of integrity and to live up to the highest ethical standards.

FKI always complies with the legislation in force at all times in all aspects of the company's practice and conduct.

This FKI Code of Conduct is to be regarded as the applicable guidelines for all the company's employees, managers, directors and others who act on behalf of FKI.

The Code of Conduct contains the ethical rules that FKI has established for its employees' conduct in connection with the performance of their work tasks, as well as specifying the legal requirements that employees undertake to comply with.

The Code of Conduct shall promote:

- Honest and ethical behaviour, including the ethical management of conflicts of interest between personal and professional relationships
- Compliance with applicable laws, rules and regulations
- The personal responsibility, by complying with the framework for conduct set out in the Code of Conduct when working for FKI
- Immediate reporting to the CEO in case of violation of the Code of Conduct

If an employee experiences situations that violate this Code of Conduct, has doubts or concerns, he/she can contact the CEO.

Contact information can be found at [www.fki.dk](http://www.fki.dk).

It is also possible to contact the company's union rep. or safety representative.

Any employee who violates the standards described in the Code of Conduct, or who is found to have been involved in retaliation against an employee if he or she, in good faith has drawn attention to a violation of FKI's Code of Conduct, may be subject to legal consequences in relation to their employment.



## 1. Confidentiality

1.1 Confidential information is information that may benefit competitors or harm FKI, its customers, suppliers or other partners. This includes financial documents, pricing information, development materials, personnel information, procedures, software, design documents, and internal reports. Published information, such as press releases or statutory reports, is not considered confidential.

The duty to protect confidential information also applies after employment or cooperation with FKI has ended.

1.2 Employees must maintain the confidentiality of all confidential and non-public information entrusted to them by FKI and its customers, suppliers and relevant third parties with whom FKI do business, unless the disclosure is authorized by FKI's management or required by law, rules or regulations.

In case of uncertainty as to whether information is confidential, employees can contact the CEO.

1.3 With regard to FKI's confidential information, an employee must not:

- disclose confidential information to anyone outside FKI
- use confidential information for any purpose other than for the benefit of FKI's business activities
- disclose confidential information to other persons employed by or otherwise affiliated with FKI, unless they need to know (or need) the information in order to perform their work and they have also been made aware that it is a trade secret
- disclose confidential information in a forum, including blogs, wikis, chat rooms, electronic bulletin boards, or similar publicly available online or social media forums.

## 2. Intellectual Property Protection

2.1 FKI's intellectual property includes patents, trademarks, copyrights, trade secrets, company tools and methods and other differentiating factors considered to belong to FKI and which FKI uses to brand itself, its products and solutions in the market.

2.2 FKI's employees must protect FKI's intellectual property against disclosure and misuse.

2.3 FKI's employees must also comply with the intellectual property rights of business partners. If guidance is needed, the Managing Director can be contacted.

## 3. Protection of personal data

3.1 FKI respects the privacy of all employees, business partners and customers. Therefore, FKI processes all personal data in a responsible manner and in accordance with applicable data protection laws.

3.2 An employee who processes the personal data of others must:

- act in accordance with applicable law, including the GDPR
- act in accordance with all relevant contractual obligations
- collect, use and process such information solely for legitimate business purposes
- restrict access to information so that only people with a legitimate business purpose have access to information
- ensure that unauthorized disclosure of personal data is prevented.

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## 4. Good business practice

- 4.1 FKI wants competition that is fair and that takes place in the most orderly and honest manner, where unethical or illegal business methods are not used. FKI's employees must strive to interact with their colleagues and FKI's customers, suppliers and competitors in a fair manner.
- 4.2 FKI's employees may not dishonestly acquire proprietary information or trade secrets.
- 4.3 Such information may also not be disclosed through former employees who are now working in other companies.
- 4.4 FKI's employees must not use manipulation, concealment, fabricate untruths, misuse confidential information or use other forms of unfair practices, as well as deliberately or deliberately falsify documents or data to obtain unfair advantages.

## 5. Protection and proper use of company assets

- 5.1 FKI's employees must protect FKI's assets and property and ensure that they are used effectively and correctly. Theft and carelessness can have a direct impact on FKI's profitability.
- 5.2 FKI's employees must report any suspicion of fraud or theft to the CEO immediately.
- 5.3 FKI's employees may only use FKI's assets and property for legitimate business purposes.  
  
FKI's assets include proprietary information such as trade secrets, patents, trademarks, copyrights, business and service plans, technical ideas, designs, databases, assets, payroll information, and other undisclosed financial data.
- 5.4 Unauthorized use or sharing of this information is a violation of FKI's policy and may result in immediate disciplinary action, including termination, as well as civil and criminal sanctions.

5.5 A key asset is the information generated through business activities, whether technical, commercial or financial. All information that employees encounter in the course of their work belongs exclusively to FKI, this includes non-public information that could benefit competitors or harm FKI and its customers if disclosed.

5.6 The protection of this information is essential for FKI's growth and competitiveness, and it may only be made public if approved by management.

## 6. IT tools and resources

- 6.1 FKI's IT tools, including email systems, internet services and remote access via personal devices (e.g. computer or smartphones) are intended to help make the workplace more efficient. When the employee uses these resources, FKI expects them to show the utmost respect and care for the systems.
- 6.2 Personal use of IT tools may be acceptable when permission has been given by the immediate manager and if it does not get in the way of one's work tasks.
- 6.3 FKI's employees must never use the IT tools in a way that infringes a third party's intellectual property rights, including downloading, copying or sending copyrighted materials (e.g. music and films), including through the use of artificial intelligence AI.
- 6.4 FKI's employees may not reproduce, distribute or modify copyrighted materials without the permission of the copyright holder or an authorized representative.
- 6.5 FKI also requires that computer software may only be distributed in accordance with the terms of the applicable license agreement and that any use of open-source software must be pre-approved. IT tools may not be used for personal benefit, political purposes, or any form of solicitation prohibited by FKI's policies.

6.6 Data on and use of personal devices used for business purposes is considered the property of FKI for the limited purpose of authorizing FKI to remove such data and information upon an employee's termination of employment or resignation from business activities.

6.7 FKI employees are not allowed to access, send or download pornographic, vulgar, violent, racist or sexually offensive material or other messages that can be considered harassment when using FKI equipment. Employees must not "flood" FKI's systems with material that compromises the systems' ability to carry out legitimate business activities.

6.8 FKI's employees must exercise due diligence and good judgment when using social media. It is important that no employee improperly gives the impression that he/she is individually speaking on behalf of FKI in connection with the use of social media, unless he/she has explicit authority to do so.

## 7. Compliance with laws, rules and regulations

7.1 FKI's employees must comply with the laws, rules and regulations applicable in the countries in which FKI operates. FKI expects all employees to comply with FKI's policies regarding corporate transactions and to comply with the statutory requirements and ethical standards applicable in the countries in which FKI operates.

Employees should contact the CEO if they have any questions or doubts about compliance with laws, rules or regulations.

## 8. Anti-corruption legislation

8.1 FKI follows the applicable rules of the Danish Penal Code regarding corruption/bribery. FKI's employees are expected to comply with this legislation. Violation may result in disciplinary action.

## 9. Export legislation

9.1 FKI's employees must comply with all export control laws related to the export of goods and technical data across international borders.

## 10. Legislation on boycott

10.1 According to foreign and domestic laws against boycott, FKI may not discriminate against or refuse to trade with a country Denmark does not support the boycott.

## 11. Trade sanctions and embargoes

11.1 FKI must comply with all economic sanctions and trade embargoes imposed by Denmark or countries in which FKI operates. An FKI employee must consult with the CEO if he/she becomes aware that FKI performs or is asked to perform services in an embargoed country, or if the employee generally has doubts or questions about sanctions or embargoes.

## 12. Political contributions

12.1 FKI does not contribute, either directly or indirectly, to political campaigns or parties.

12.2 FKI's employees may not use representation accounts to pay for personal political contributions or seek any other form of compensation from FKI for such contributions.

12.3 An employee is free to make personal political contributions within the framework of the law, but FKI's employees are not allowed to make these contributions in a way that allows them to appear as a support or contribution from FKI. The employee must agree to this before a political contribution is made.

## 13. Competition law

- 13.1 In the effort to ensure a fair and competitive market, where no individual company has a monopoly, FKI always operates in accordance with the Competition Act. FKI competes on the basis of its services, prices, and customer loyalty.
- 13.2 Illegal agreements with e.g. competitors on fixed prices or the like, both in writing or derived from "loose talk" and informal conversations as well as the exchange of information, are strictly prohibited.
- 13.3 If an employee feels that a conversation is moving into an inappropriate area, he/she must terminate and report to the CEO.

## 14. Insider trading

- 14.1 It is illegal and unethical for FKI's employees to trade securities or provide trading tips while they have access to material, undisclosed information about these securities, or if they share such information with others who then act on it.
- 14.2 Material undisclosed information includes anything relating to FKI, its suppliers or customers that an investor would consider to be material to a decision to purchase, sell or hold the security. Unpublished information is information that FKI has not communicated to the market through a press release or similar. The materiality of a piece of information is assessed retrospectively. If an employee is in doubt about whether something is significant or undisclosed, they should generally assume that it is both. In case of persistent doubt, the employee must contact the CEO.

## 15. Discrimination and harassment

- 15.1 FKI requires that policies and applicable laws regarding equal employment opportunities and discrimination in the workplace are complied with. FKI does not tolerate discrimination or harassment of any kind.
- 15.2 Relationships between colleagues and business relationships with competitors, suppliers and customers must always take place without any form of discrimination. Discrimination can be based on the following: ethnic origin, skin colour, religion, age, gender, sexual orientation, national origin or disability.

## 16. Health and Safety

- 16.1 At FKI, we aim to create a safe and healthy working environment for all employees. Each employee is responsible for complying with and following safety and health rules, in order to contribute to the maintenance of a safe and healthy workplace for themselves and their colleagues. Employees are required to report accidents, injuries, unsafe equipment, unsafe practices or conditions to the company's safety representative.
- 16.2 FKI does not tolerate violence or threatening behaviour in the workplace.
- 16.3 There is a requirement that FKI's employees come to work in a condition where they can perform their duties in a responsible manner and not be under the influence of alcohol or illegal drugs.
- 16.4 FKI does not tolerate the use or presence of illegal substances in the workplace.

## 17. Reports on accounting and auditing issues

17.1 If FKI employees have concerns regarding questionable accounting, internal accounting controls or audit matters related to FKI, they must report this.

Examples of such concerns may include the following:

- Fraud or deliberate errors in the preparation, evaluation, review or audit of FKI's accounts
- Fraud or deliberate errors in the registration and storage of FKI's accounts
- Deficiencies in or non-compliance with FKI's internal accounting controls
- Misrepresentation or false explanation to or by a superior or an accountant regarding a matter in FKI's accounts, financial reports or audit reports, or
- Deviation from complete and fair reporting of FKI's financial affairs.

The employee must notify the CEO of any complaints received regarding accounting matters.

17.2 FKI prohibits intimidation or retaliation for reports of dishonest behavior by others that the employee reports in good faith.

## 18. Payments to government employees or candidates for office

18.1 FKI's employees must never use payments to others to indirectly achieve what FKI cannot achieve by correct or legal means. Any fees, commissions or other amounts paid by employees to external consultants, agents or other third parties must be lawful, proper and reasonable in relation to normal commercial practice. FKI expects all employees to fully disclose and disclose these amounts to the CEO.

## 19. Reporting illegal or ethical behavior

19.1 FKI's employees are encouraged to contact the Managing Director regarding observed illegal or unethical behaviour that is contrary to the Code of Conduct.



# **Fast Food Teknik a/s**

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