

Code of Conduct for Business Partners

Version: Nov. 2022

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1. Introduction

The Code of Conduct for Business Partners is designed to ensure that the principles set out in the Zumtobel Group's Code of Conduct and Due Diligence principles (referred to in section 4 below) are applied and shared throughout the value chain beyond their own organisation. The Code of Conduct for Business Partners is an integral part of all contracts between the Zumtobel Group (with all its business units) and its business partners.

The Zumtobel Group expects its business partners and their employees to recognise the principles and Due Diligence principles described in the Code of Conduct, to comply with them and to share them with their direct business partners and employees.

The following principles (including Due Diligence principles) apply to the Zumtobel Group as well as to its business partners and employees. If a direct or indirect business partner of the Zumtobel Group becomes aware that the Zumtobel Group or any other business partner is violating any of these principles, this can be reported to the Zumtobel Group's [whistleblower hotline](#) set up for this purpose.

The whistleblower system allows anonymous reports to be made, is hosted externally and can be accessed via the [Zumtobel Group website](#). Alternatively, business partners can also submit reports by e-mail to the Zumtobel Group's Compliance Department.

E-mail: compliance@zumtobelgroup.com

2. Due Diligence

Both the Zumtobel Group and its business partners must ensure that risk analyses are carried out on an ongoing basis in order to comply with the Due Diligence principles. This is intended to create the preconditions for ensuring that no conflicts of interest arise. Care is also taken to ensure that mechanisms such as a whistleblowing system, a hotline or a contact person are in place or that responsible offices are available to report possible conflicts of interest or violations of the principles of the Code of Conduct and compliance with the Due Diligence principles along the entire value chain. This enables the Zumtobel Group and its business partners to address potential violations jointly and in a solution-oriented manner.

3. General principles of conduct and expectations towards business partners

- Business partners that have implemented processes to ensure that their employees support the Due Diligence framework throughout the value chain in relation to human rights and environmental risks.
- Business partners who have implemented processes to ensure that their employees comply with laws and other applicable legal requirements in countries where their business is conducted.
- Business partners and their employees have implemented processes to actively combat any form of money laundering and corruption, and no form of money laundering and corruption is tolerated.
- Business partners and their employees are committed to fair competition and processes are in place to demonstrate this.

- Business partners and their employees respect all forms of property and protect the property of their business partners.
- The conduct of business partners and their employees is characterised by respect, honesty, transparency and reliability, in order to enable the Zumtobel Group to build a long-term partnership based on trust.

4. Due Diligence principles and policies

4.1. Respect for human rights

As an internationally active company, the Zumtobel Group is committed to respecting human rights and eliminating violations of such rights and also expects its business partners and their employees to do the same. The Zumtobel Group, its business partners and their employees respect/accept the requirements and minimum standards described in this section and implement measures to comply with them.

The requirements and minimum standards refer to national laws and to the principles and framework conditions for compliance with Due Diligence in the entire value chain with regard to human rights risks and are based on the conventions of the International Labour Organisation (ILO) and the relevant standards of the United Nations.

- **Freedom of Association**
 - Convention 87 recognising the principle of freedom of association and protecting the right to organise.
 - Convention 98 concerning the Application of the Principle of the Right to Organise and to Bargain Collectively.
- **Forced and Compulsory Labour**
 - Convention 29 concerning the early elimination of the use of forced or compulsory labour in all its forms.
 - Convention 105 concerning the elimination of forced or compulsory labour in all its forms.
- **Child labour**
 - Convention 138 to ensure the elimination of child labour, to comply with the minimum age limit of 15 years or the end of compulsory education or limits under national law in coordination with Convention 138.
 - Convention 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child labour.
 - If national law on child labour provides for stricter minimum standards, these take precedence.
- **Discrimination and fair working conditions**
 - Convention 100 to apply the principle of equal pay for male and female workers for work of equal value in accordance with the laws of the respective countries of operation of the business partners and their employees.

- Ensure, in accordance with the laws of the countries in which the business partners operate, that the wages paid are a living wage in accordance with the International Labour Organisation (ILO) Convention and the relevant United Nations standards.
- Convention 111 to prevent discrimination (differentiation, exclusion or preference) on the basis of e.g. gender, religion, age, race, social background, nationality, disability, sexual orientation, etc. and promote equality in employment.

- **Occupational safety and health**

- Convention 155 on safety at work. Workplaces, machinery, equipment and processes must not pose a risk to the safety and health of workers.
- Convention 187 on the Promotional Framework for Occupational Safety and Health to contribute to the prevention of occupational accidents, diseases and fatalities through appropriate measures.
- The protection of employees at the workplace and the health protection of employees (e.g. external service providers) is ensured within the framework of national regulations and the process for improving working conditions is continuously advanced.

4.2. Environment and sustainability

Sustainability is an essential and important topic for the Zumtobel Group. To this end, the Zumtobel Group has documented its sustainability performance in accordance with the globally applicable GRI 2021 reporting standard and published it in a sustainability report, thereby ensuring comprehensive transparency for all business partners.

The Zumtobel Group aims to demonstrate its efforts in sustainability performance not only in its own business activities, but also to consider, expand and further develop its commitment to the environment and sustainability along the entire value chain and includes its business partners and their employees in its ecological responsibility. Business partners are encouraged to introduce environmental management systems (e.g. ISO 14001) in order to continuously develop sustainability performance, optimise the use of resources and reduce environmental impact.

The Zumtobel Group, its business partners and their employees respect the requirements and minimum standards described in this section. These refer to the principles and framework conditions for compliance with Due Diligence throughout the value chain with regard to environmental risks. Business partners identify actual and potential negative impacts and develop measures to minimise, avoid and prevent harmful environmental impacts.

- **Reduction of environmental impacts**

- Minamata Convention on the Control of Emissions and Releases of the Heavy Metal Mercury, prevention of significant adverse impacts on ecosystems, prevention of risks to human health.
- Stockholm Convention on the Prohibition of Persistent Organic Pollutants, prohibition of production and use, restriction of production and use.
- Basel Convention on the Control of Transboundary Movements (Imports and Exports) of Hazardous Wastes and their Disposal.

The circular economy is increasingly on the agenda of companies. Challenges such as resource scarcity, fluctuating raw material prices, consumer preferences and increasing regulatory requirements are forcing companies to rethink inefficient and ineffective production and consumption models and to adopt new approaches. This requires breaking down traditional linear structures in order to create new and innovative systems that meet the requirements of a circular economy. The Zumtobel Group, its business partners (suppliers) and their employees respect the need to preserve what already exists, protect the environment and make optimum use of resources, materials and products. This generates economic, social and ecological added value.

- **Promoting the circular economy**

- The Zumtobel Group and its suppliers work together to promote and record the proportion of recycled material in source materials. This is done with a view to the material's properties and application. The proportion of recycled material should not contribute to the deterioration of material properties.

4.3. Corruption and anti-money laundering

The Zumtobel Group has zero tolerance for corrupt behaviour and money laundering. This also includes bribery, extortion and embezzlement. When dealing with the Zumtobel Group's business partners and state or public institutions, the interests of companies and the private interests of their employees or representatives on both sides of a transaction must be strictly separated. Actions and purchasing decisions are made independently of personal interests or considerations that have no connection with the business in question. Applicable anti-corruption laws must be observed at all times.

The principles of entrepreneurial and responsible management, such as accountability, transparency and integrity, are observed in all areas of the business relationship between the Zumtobel Group and its business partners. Business partners will implement structural and operational preventive measures to avoid all forms of corruption and promote anti-money laundering.

The Zumtobel Group will take immediate and unannounced action to remedy corruption and money laundering if it becomes aware of them..

4.4. Criminal acts in dealings with public officials and in business dealings in general

Benefits such as payments, loans or gifts (including the repeated granting of even small gifts) from contractual partners to public officials (e.g. civil servants) with the aim of seeking or obtaining advantages for the contracting company or for third parties are prohibited from the perspective of the Zumtobel Group.

All employees and the Management Board/management of the Zumtobel Group are strictly prohibited from offering, promising, demanding, giving or accepting gifts, payments, invitations, services or other benefits in business dealings that are intended to influence the business relationship in an improper manner or that could jeopardise the professional independence of the business partner. This does not apply in principle to gifts and invitations which are to be regarded as generally accepted business practice in terms of hospitality, convention and courtesy.

4.5. Conduct vis-à-vis competitors (antitrust law)

Fair competition is respected by the Zumtobel Group. Existing laws on the preservation and promotion of competition, in particular applicable antitrust law, are strictly observed by the Zumtobel Group. In particular, the Zumtobel Group requires that contracted companies do not enter into any agreements with competitors that have the purpose or effect of restricting competition and, where applicable, improve a dominant position in the market..

4.6. IT Security

Business partners comply with IT security standards that ensure the integrity, availability and confidentiality of entrusted data. This includes appropriate measures and employee training on cyber threats such as social engineering (e.g. via phone calls) or phishing, each of which targets human vulnerabilities.

4.7. Intellectual property and confidential information

Business partners shall respect intellectual property rights and protect the Zumtobel Group's business and trade secrets. The Zumtobel Group prohibits the disclosure of confidential information and documents to third parties or making them accessible in any other form without appropriate authorisation.

4.8. Social media

The business partners shall ensure that in the event of the use of social media in the working environment of employees, the Zumtobel Group must not suffer any damage to its image through the publication of posts. The Zumtobel Group's consent must be obtained before any use of logos of the Zumtobel Group and its business units.

4.9. Data protection

The protection of personal data is a top priority for the Zumtobel Group. The Zumtobel Group expects business partners and their employees to comply with all contractual and legal requirements that apply to the processing of personal data of the Zumtobel Group or the personal data of customers of the Zumtobel Group. The Zumtobel Group's data is protected by an appropriate level of technical and organisational measures and the Zumtobel Group's business partners promptly report any suspected data breaches or data leaks.

5. Monitoring and partnership

The principles listed and the Due Diligence principles are important to the Zumtobel Group. The Zumtobel Group reserves the right to continuously monitor compliance with the principles and Due Diligence principles set out in the Code of Conduct. In order to ensure compliance with the principles and principles as well as compliance with predefined measures, this may include occasional and, in the case of business partners (suppliers) with identified increased risks, unannounced inspections. The Zumtobel Group expects its business partners to communicate transparently and cooperate actively in closing any gaps or violations identified. Non-compliance with this Code of Conduct and/or failure to remedy serious deficiencies through appropriate measures may result in the termination of the business relationship.

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It is common that from time to time in the course of a business relationship it may not be possible to resolve a disagreement immediately. However, this should in no way lead to any outwardly derogatory comments about the partnership or business relationship. The Zumtobel Group expects that disagreements and conflicts of interest will be discussed and resolved directly with the relevant persons within the Zumtobel Group or that the escalation mechanisms mentioned in the introduction will be used.

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Acknowledgement of the business partner

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Name

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Function

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Place

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Date

Company stamp of the business partner

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Zumtobel Group AG, Höchster Strasse 8, 6850 Dornbirn, Austria
Legal form of Company: AG, Registered Office: Dornbirn, Austria,
Registered No.: FN 62309g, Register Court: LG Feldkirch