

Business Partner Code of Conduct

As a Supplier of the Zumtobel Group AG, we expect you to agree to adhere to the following guiding principles and to share them with your immediate business partners (both customers and suppliers) to promote legal compliance and ethical behavior.

General Principles and Laws

In all business activities and decisions, your company commits to respecting the laws and any other applicable legal provisions in the countries where you are active. Your business partners are treated fairly and contracts are adhered to.

Corruption

The interests of companies and the private interests of their employees or representatives on both sides of any given transaction are to be kept strictly separate when dealing with business partners (both customers and suppliers) and state or public institutions. Actions and purchasing decisions are made independently from personal interests or considerations with no connection to the business at hand. Anti-corruption law will be complied with at all times.

Criminal Acts in Dealings with Public Officials

Benefits such as payments, loans or gifts (including repeatedly making even smaller gifts) by contracting parties to public officials (such as civil servants) with the objective of seeking or obtaining advantages for the contracting company or for third parties are strictly prohibited.

Criminal Acts in Business Dealings

ZUMTOBEL Group

Both management and employees are strictly prohibited in the course of business dealings to offer, promise, demand, give or accept gifts, payments, invitations, services, or other favors with the aim of influencing a business relationship in a prohibited way or which entail the risk of jeopardizing the professional independence of the business partner. This generally does not apply to gifts and invitations that qualify as generally accepted business practice with regard to hospitality, convention and courtesy.

The contracting company must have a designated person who can be contacted when employees of the contracting company feel that they are in or could into a conflict of interest situation.

Conduct vis-à-vis Competitors (Anti-trust Law)

Fair competition is respected. Existing laws that uphold and promote competition, in particular applicable anti-trust laws, are strictly adhered to. In particular, the contracting company may not collude with competitors with the aim or the effect of restricting competition nor, if applicable, abuse its dominant market position.

Forced Labor & Child Labor

The contracting company may not participate in any form of slavery, forced labor, slave labor, trafficking or non-voluntary labor.

United Nations conventions on human rights are respected. The Convention concerning the Minimum Age for Admission to Employment (Convention No 138 of the International Labor Organization) as well as the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor (Convention No 182 of the International Labor Organization) are adhered to. If a national legal provision concerning child labor provides for stricter standards, such stricter standards shall take precedence.

Principles promoting Social Responsibility:

Human Rights

The contracting company respects and supports compliance with internationally recognized human rights.

Discrimination

All forms of discrimination are rejected within the scope of applicable laws. This applies in particular to unfair treatment on the basis of gender, race, disability, ethnic or cultural origin, religion or world view, age or sexual orientation.

Health Protection

Protection of workers in the workplace and employee health protection within the scope of national provisions is guaranteed and advancement of this process towards improvement of the working environment is continuous.

Fair Working Conditions

The contracting company respects its employees' right of association within the scope of applicable laws.

Environmental Protection

Sustainably upholding the goal of protecting our environment for current and future generations is a fundamental part of doing business. Laws passed for the protection of the environment are to be obeyed and environmentally-minded actions on the part of the employees of the contracting company are fully supported.

Company Secrets

Employees are committed to safeguarding trade and company secrets. It is forbidden to divulge confidential information and documents to third parties without proper authorization or to provide other forms of access to them.

ZUMTOBEL Group

This agreement has been drawn up between:

Place/Date
Zumtobel Group AG
(or Subsidiary)

Place/Date
Supplier Name

Name Zumtobel Representative
Supplier
Function

Name Representative
Function

Place/Date
Zumtobel Group AG
(or Subsidiary)

Place/Date
Supplier Name

Name Zumtobel
Representative
Function

Name Representative
Supplier
Function

company stamp

company stamp

5th June 2019