a world of bright ideas ®

TRIDONIC.ATCO

TridonicAtco NZ Limited 9 Aintree Avenue PO Box 107 044 Airport Oaks Mangere Auckland New Zealand www.tridonicatco.co.nz

Tel. +64 9 256 2310 Fax +64 9 256 0109

17th December 2009

Secretary-General United Nations New York, NY 10017 USA

Dear Mr.Georg Kell Executive Director

Further to our letter of 29th November 2007, I am pleased to confirm that TridonicAtco NZ Ltd. continues to support the principles of the United Nations Global Compact in respect to human rights, labour rights, the environment and anti-corruption.

With this communication, we express our intent to continue such support and advance those principles within our sphere of influence. We commit to making the Global Compact and its principles part of the strategy, culture and day-to-day operations of our company and undertake to make a clear statement – to our employees, partners, clients and to the public – of this commitment.

Attached please find our "Communication on Progress" (COP) dated 17th December 2009, general information relating to our company and products of which are available against <u>http://www.tridonicatco.com</u>.

We trust the above are in order.

Sincerely yours,

Mr. Paul de Knegt Managing Director TridonicAtco NZ Ltd



CORPORATE SOCIAL RESPONSIBILITY

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Global Compact Area – Human Rights

Principle 1 Business should support and respect the protection of internationally proclaimed human rights; and

Principle 2 make sure that they are not complicit in human rights abuses.

Human Rights Background:

New Zealand meets international human rights standards and in many cases often surpasses them. We as a country realise the important role that human rights play in providing a peaceful and sustainable environment.

TridonicAtco NZ maintains compliance with the New Zealand Human Rights Act 1993 and the New Zealand Bill of Rights Act 1990. TridonicAtco NZ ensures that all its employees are treated with dignity and given fair and just rewards for their work. TridonicAtco NZ does not knowingly support companies that practice or overlook human rights abuses.

Human Rights Objective:

TridonicAtco NZ understands that human rights abuses allow for poverty, violence and terrorism to flourish. TridonicAtco NZ's main human rights objective is to eliminate support to all companies that practice or overlook human rights abuses.



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Global Compact Area – Labour

Principle 3	Businesses should uphold the freedom of association and the effective recognition
	of the right to collective bargaining;
Principle 4	the elimination of all forms of forced and compulsory labour;
Principle 5	the effective abolition of child labour; and
Principle 6	the elimination of discrimination in respect of employment and occupation.

Labour Background:

TridonicAtco NZ maintains compliance with the New Zealand Employment Relations Act 2000. Global Compact Principles 3 to 6 are endorsed by Employment Relations Act. Furthermore as a minimum requirement the Employment Relations Act requires employers to provide:

- a safe workplace with proper training, supervision and equipment
- a written employment agreement for every employee
- equal pay and equal rights
- annual leave / sick leave / bereavement leave / parental leave / public holidays

TridonicAtco NZ ensures that qualifications, experience and skill are the main criteria for recruitment, training and advancement.

Labour Objective:

TridonicAtco NZ is an entrepreneurial company and hence we realise the need for our employees to be creative and innovative.

TridonicAtco NZ is focused on offering a climate of openness, creativity, honesty and respect for diversity.

The aim of this working environment is to enable our employees unique opportunities to develop to their full potential and show exception performance.





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Global Compact Area – Environment

Principle 7 Businesses are asked to support a precautionary approach to environmental challenges;
Principle 8 undertake initiatives to promote greater environmental responsibility; and
Principle 9 encourage the development and diffusion of environmentally friendly technologies.

Environment Background:

TridonicAtco NZ recognises the New Zealand government efforts to provide a clean healthy environment for both the present and future generations of New Zealanders. The National Environmental Standards enforced throughout the country helps to ensure that everyone in New Zealand has clear air to breath, clean water to drink and clean land to live on.

Environment Objective:

TridonicAtco NZ is committed to maintaining and protecting New Zealand's clean green image because we believe this is an essential value adding process which we can benefit from.

TridonicAtco NZ is committed to the development of environmentally sound new products.

TridonicAtco NZ is committed to reducing waste materials produced during manufacturing processes.





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Global Compact Area – Anti-Corruption

Principle 10 Businesses should work against corruption in all its forms, including extortion and bribery.

Anti-Corruption Background:

TridonicAtco NZ defines corruption as 'the abuse of a position of trust in order to achieve improper financial or other advantage'. We are aware that corporate corruption can take many forms such as:

- bribery, price-fixing agreements, facilitation payments
- money laundering
- inappropriate favours, hospitality or gifts

TridonicAtco NZ has a Code of Conduct which contains detailed regulations which all employees must observe on these issues as well as other sensitive issues such as:

- sponsorship
- political and charitable donations
- and relations with the authorities

Anti-Corruption Objective:

TridonicAtco NZ will not condone any form of corruption. Briefly, the giving or accepting of undue advantage and other forms of corruption, along with the damage caused by such misconduct worldwide, are a serious issue in today's legal, economic and political environment.

For this reason, in September 2004 the Zumtobel Group of which TridonicAtco NZ is a member, made a clear commitment to introducing anti-corruption regulations for all business dealings, transactions and processes in all Zumtobel Group companies worldwide of which TridonicAtco NZ is a member.

As an active participant in the World Economic Forum's Partnering Against Corruption Initiative (PACI) the goal of the Zumtobel Group of which TridonicAtco NZ is a member, is to actively combat the various forms of corruption in international and national business dealings.



