

14th February 2012

Secretary-General
United Nations
New York, NY 10017
USA

Dear Mr. Georg Kell
Executive Director

Further to our letter of 17th December 2009, we are pleased to confirm that Tridonic New Zealand Limited continues to support the principles of the United Nations Global Compact in respect to human rights, labour rights, the environment and anti-corruption.

We confirm 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.

Of interest and in addition to the attached COP content we advise our head office is in the process of updating / revising our group's "Code of Conduct". The 7 basic principles that make up the code are:

- We respect human rights and condemn all forms of discrimination.
- Our behavior is marked by respect, honesty, transparency and dependability.
- We comply with the laws and company policies that apply to us.
- We tolerate no corruption of any kind and report corrupt behavior by others.
- We always act in the best interests of the company.
- We respect all forms of property.
- We stand for fair competition.

Attached please find our "Communication on Progress" (COP) dated 14th February 2012, general information relating to our company and products of which are available against <http://www.tridonic.com>.

Sincerely yours,



Mr. Paul de Knegt
Managing Director
Tridonic New Zealand Limited.



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14th February 2012
CORPORATE SOCIAL RESPONSIBILITY

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.*

Protection of internationally proclaimed Human Rights:

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.

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

No complicit in Human Rights abuses:

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

Tridonic NZ employees and those who do business with us around the world know we are committed to earning their trust with a set of values that represent the highest standards of quality, integrity, excellence, compliance with the law and respect for the unique customs and cultures in communities where we operate.

Tridonic NZ is holding regular Health & Safety Committee meetings and also having periodic Fire Evacuation practice, supervised by an external provider.

The Zumtobel Group is normally monitoring our injury rates on a monthly / yearly basis. Tridonic NZ is reporting Safety report at the Group Head quarter each month.

Please refer to attachment A.1 and A.2 on the following pages for safety reports for Tridonic Global Operations and Tridonic NZ for the period Feb 2011 to Dec 2011.

Following the table is giving better picture of Tridonic NZ’s effort towards Health & Safety.

	05/2008 to 04/2009 (12 months)	05/2009 to 04/2010 (12 months)	05/2010 to 01/2011 (9 months)	02/2011 to 12/2011 (11 months)
LTI (Lost Time Injury)	2	2	1	2
TRI (Total Recordable Injury)	3	2	3	2
Total working hours	62236	58369	91924	99007

14th February 2012

CORPORATE SOCIAL RESPONSIBILITY

The monthly TRI rate (total recorded injuries per million hours worked) is recorded in all our plants. All incidents, regardless of their impact, are included in the calculations. The most frequent injuries are those caused by cuts. In the long term, the Zumtobel Group is aiming to reduce the TRI rate to 10. Currently, targeted TRI rate is 13.

The LTI rate (Lost Time Injuries or number of working days missed due to injuries per million hours worked) is measured in order to differentiate between industrial accidents having various degrees of seriousness. Industrial accidents are taken into account if they involve more than eight hours off work.

Measures such as employee training, improvements in protective clothing, upgrading of installed machinery, etc. are constantly being taken in order to improve occupational safety. The Tridonic NZ is continually making investments to improve working conditions. By preventative and corrective actions throughout the year, Tridonic NZ is targeting to reduce the number of injury rates for the upcoming year.

Tridonic NZ provides a safe and healthy workplace. We are dedicated to maintaining a productive workplace by minimizing the risk of accidents, injury and exposure to health risks.

In addition, Tridonic NZ arranges following to keep their safe & healthy workplace for everyone:

- Influenza Vaccination at the beginning of winter each year.
- Hearing Test for all employees from New Zealand certified organization & further hearing aids support – guidance for whom having hearing loss.
- Safe Material Handling Procedure training session by ACC (Accident Compensation Corporation, NZ) approved Trainer to avoid back injury at work place.
- Fire Extinguisher Refresher course for trained representatives.
- Monthly Hazards review & training.
- Refresher courses for Forklift Truck Operators.

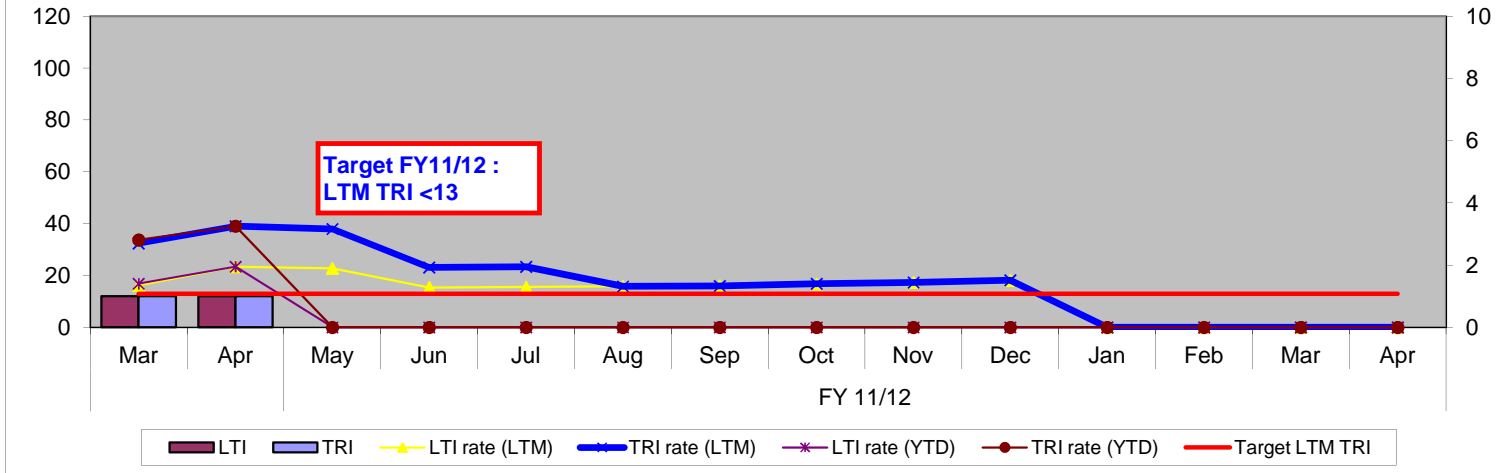
14th February 2012
CORPORATE SOCIAL RESPONSIBILITY

ATTACHMENT A.1

Safety Report:

Auckland Plant

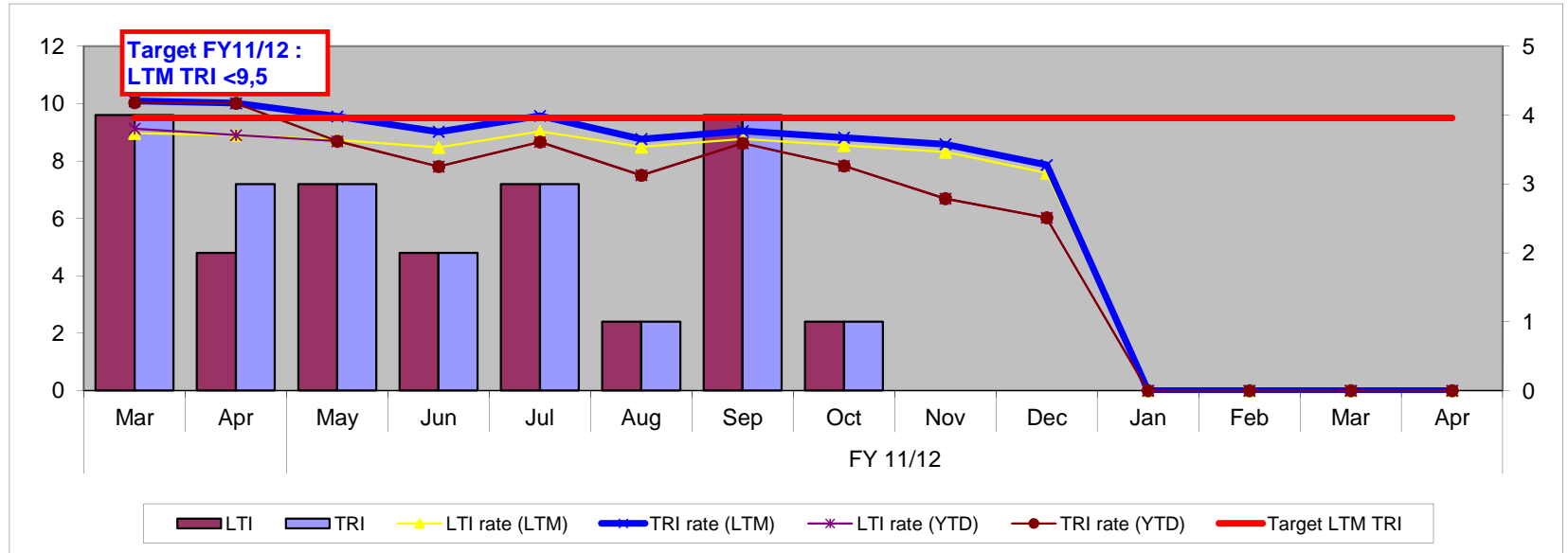
Status: Dec-11



	FY 10/11		FY 11/12											
	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr
LTI	1	1	0	0	0	0	0	0	0	0				
TRI	1	1	0	0	0	0	0	0	0	0				
hours	14,773	9,555	12,393	8,781	7,722	8,193	6,448	4,469	8,917	5,912				
LTI rate (month)	67.7	104.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
TRI rate (month)	67.7	104.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
LTI rate (LTM)	16.19	23.42	22.79	15.41	15.59	15.79	16.02	16.80	17.36	18.16	0.00	0.00	0.00	0.00
TRI rate (LTM)	32.38	39.03	37.98	23.11	23.38	15.79	16.02	16.80	17.36	18.16	0.00	0.00	0.00	0.00
LTI rate (YTD)	16.87	23.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TRI rate (YTD)	33.74	39.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Target LTM TRI	13	13	13	13	13	13	13	13	13	13	13	13	13	13

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ATTACHMENT A.2



	FY 10/11		FY 11/12											
	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr
LTI	4	2	3	2	3	1	4	1	0	0	0	0	0	0
TRI	4	3	3	2	3	1	4	1	0	0	0	0	0	0
hours	345,428	306,994	345,128	295,055	282,611	275,985	309,088	279,289	304,195	230,916	0	0	0	0
LTI rate (month)	11.6	6.5	8.7	6.8	10.6	3.6	12.9	3.6	0.0	0.0	0.0	0.0	0.0	0.0
TRI rate (month)	11.6	9.8	8.7	6.8	10.6	3.6	12.9	3.6	0.0	0.0	0.0	0.0	0.0	0.0
LTI rate (LTM)	8.97	8.90	8.74	8.48	9.03	8.49	8.77	8.55	8.31	7.59	0.00	0.00	0.00	0.00
TRI rate (LTM)	10.09	10.02	9.56	9.02	9.58	8.77	9.05	8.82	8.59	7.87	0.00	0.00	0.00	0.00
LTI rate (YTD)	9.13	8.90	8.69	7.81	8.67	7.51	8.62	7.83	6.69	6.03	0.00	0.00	0.00	0.00
TRI rate (YTD)	10.04	10.02	8.69	7.81	8.67	7.51	8.62	7.83	6.69	6.03	0.00	0.00	0.00	0.00
Target LTM TRI	9.5	9.5	9.5	9.5	9.5	9.5	9.5	9.5	9.5	9.5	9.5	9.5	9.5	9.5

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CORPORATE SOCIAL RESPONSIBILITY

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*

Tridonic NZ's Employee Rights Policy is guided by international and New Zealand human rights standards, ministry of Labor, including the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and the United Nations Global Compact.

Tridonic NZ is committed to working with and encouraging our sub-contractors to uphold the principles in this Policy and to adopt similar policies within their businesses.

The Policy includes the following components:

• Freedom of Association and Collective Bargaining

The Company respects our employees' right to join, form or not to join a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. Tridonic NZ is committed to bargaining in good faith with such representatives.

• Forced Labor

Tridonic NZ prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour or slave labour.

• Discrimination at work place

Tridonic NZ values all employees and the contributions they make and has a long-standing commitment to equal opportunity and intolerance of discrimination. We are dedicated to maintaining workplaces that are free from discrimination or physical or verbal harassment on the basis of race, sex, colour, national or social origin, religion, age, disability, sexual orientation, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, training, compensation and advancement at the work place is qualifications, performance, skills and experience.

• Work Hours and Wages

Tridonic NZ compensates employees competitively relative to the industry and local labour market. We operate in full compliance with applicable wage, work hours, overtime and benefits laws. We offer employees opportunities to develop their skills and capabilities and provide advancement opportunities where possible.

• Workplace Security

Tridonic NZ is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity.

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• Child Labour

Tridonic NZ adheres to minimum age provisions of applicable laws and regulations. Tridonic NZ prohibits the hiring of individuals that are under 18 years of age for positions in which hazardous work is required. Tridonic NZ’s prohibition of child labour is very strict with International Labour Organization standards.

The Zumtobel Group, of which Tridonic NZ is a member of, has a code of conduct which everyone in the Zumtobel Group adheres to. The Zumtobel Group’s Code of Conduct states that no type of discrimination will be tolerated. A snap shot of the Zumtobel Group’s code of conduct is shown in Attachment B which can be seen on the following page. This includes:

- the cover page
- the table of contents
- the social responsibility and environmental protection section

It can be seen that the social responsibility and environmental protection section in the code of conduct addresses basic labour principles and employee working conditions which the whole Zumtobel Group abides by.

A breakdown of the age bands of the employees in Tridonic NZ has been provided in the table below:

Age Group	No of Employees - 2009/10	No of Employees - 2010/11	No of Employees - 2011/12
18 -20	4	2	1
21-30	15	23	17
31-40	11	9	8
41-50	11	11	12
51-60	10	12	13
Above 60	0	2	3
TOTAL→	51	59	54

This clearly establishes that Tridonic NZ does not discriminate against age & does not tolerate child labour. Tridonic NZ would like to ensure that Tridonic NZ only do business with companies that treat labour issues as seriously as we do.

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ATTACHMENT B

Code of Conduct

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ABOUT THIS DOCUMENT

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6 SOCIAL RESPONSIBILITY AND ENVIRONMENTAL PROTECTION

6.1 BASIC PRINCIPLES

It is very important for the Zumtobel Group that all its employees are treated in a fair and respectful manner. The Zumtobel Group and its employees also treat others in the same way.

The Zumtobel Group offers all its employees equal employment opportunities. All personnel decisions are based on performance, qualifications and similar criteria, whether the decisions involved relate to recruitment, training, remuneration or promotion.

6.2 WORKING CONDITIONS

The Zumtobel Group is committed to providing employment and working conditions in line with the recommendations issued by the International Labour Organisation (ILO) – which means that it will not tolerate child labour and undertakes, for example, to provide safe and hygienic working conditions for its employees.

The Zumtobel Group will not tolerate any working conditions which contravene international legislation and regulations. The same standards are expected of the Zumtobel Group's business partners.

6.3 MISUSE OF ALCOHOL AND DRUGS

Alcohol and other drugs can severely impair employees' ability to think clearly and carry out their tasks effectively and efficiently. They reduce productivity, and – more important still – they can endanger Zumtobel Group employees and their working environment.

All Zumtobel Group employees are therefore strictly prohibited from misusing drugs, alcohol and other intoxicating substances during working hours.

6.4 SEXUAL HARASSMENT

Sexual harassment can take a wide variety of forms, including for example explicit sexual advances, humiliating comments, jokes, offensive language or lewd gestures. Such behaviour may be interpreted as sexual harassment even when it was not intended as such.

The Zumtobel Group forbids sexual harassment in any form.

Employees who feel they are being subjected to sexual harassment can contact the relevant person or department within the Zumtobel Group (see Section 11) at any time. In doing so they can be sure that

- their report will be investigated carefully and in the strictest confidence
- neither the refusal of sexual advances nor the reporting of sexual harassment will have any negative influence on the employment situation, evaluation or income of the person making the report, providing this report was not made with malicious intent.

If any reprisals are made by employees or on their behalf because of such a report, the relevant person or department should be notified immediately so that such misconduct can be brought to an end immediately and conclusively.

6.5 DISCRIMINATION

Within the Zumtobel Group human rights are regarded as fundamental values which are universally respected and observed.

The Zumtobel Group Corporate Culture acknowledges and celebrates the fact that every human being is unique and valuable and should be respected for their individual abilities.

The Zumtobel Group will therefore not tolerate any kind of discrimination, whether it relates to:

- age
- disability
- marital status
- gender
- culture
- national or ethnic origin
- political opinion (in accordance with the UN Convention on Human Rights)
- race
- religion
- sexual orientation, or
- social class.

This principle applies equally to all business relationships with external third parties, for example customers, suppliers, consultants, dealers and other business partners of the Zumtobel Group, including its competitors.

6.6 ENVIRONMENT, HEALTH AND SAFETY

The Zumtobel Group is committed to the sensitive and sustainable treatment of resources, energy and waste and has drawn up environmental and health and safety policies accordingly. These policies comply with – and in some cases exceed – the requirements of international and national legislation and regulations.

All employees are required to observe these policies for their own protection and the protection of the environment.

Information about the Zumtobel Group's current environmental, health and safety policies can be found on the intranet.

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CORPORATE SOCIAL RESPONSIBILITY

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*

Support to environmental challenges:

Tridonic 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 breathe, clean water to drink and clean land to live on.

Tridonic 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.

Initiatives to promote environmental responsibility:

Global changes, dwindling resources and the effects of climate change – every individual has to assume responsibility. Tridonic takes its social responsibility to society and its employees just as seriously as it takes its responsibility for ensuring sustainable environmental protection and manufacturing energy-efficient products. Far-sighted ecological and social actions enable us to contribute towards protecting the environment and society at large. There is a concept for our contribution towards treating the environment, its resources and society responsibly: “ECOLUTION”.

The development of environmentally friendly technologies:

The Zumtobel Group's vision of sustainability – *“Through light, we care”* – expresses its absolute commitment to corporate responsibility. In its core business the Group develops sustainable lighting solutions that set new standards in promoting human well-being – particularly in terms of energy efficiency and light quality. This means that through its products, the company's economic interests are intrinsically linked with both social and ecological responsibility. Tridonic NZ is committed to the development of environmentally sound new products and reducing waste materials produced during manufacturing processes.

The Zumtobel Group as a whole take environmental concerns very seriously. This can be seen from:

- Attachment C.1 – Our Environment Health and Safety Policy
- Attachment C.2 – Our Ecolution Projects

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CORPORATE SOCIAL RESPONSIBILITY

ATTACHMENT C.1

Environmental, Health and Safety Policy

The Zumtobel Group's lighting brands recognise that all of its business activities have an environmental, health and safety responsibility and accordingly places a high priority regarding the management of these issues. The Environmental, Health and Safety Policy, therefore, sets out its commitment to ensuring that sound environmental, health and safety practices are integrated into all of its operations, and to show that it strives to apply high standards, internationally across the group, concerning these matters.

The Zumtobel Group's lighting brands are committed to:

Working in harmony with the community on issues of environment, health and safety, and in partnership with its customers, suppliers and employees.

The Zumtobel Group's lighting brands on-going programme of education and training will continue to be developed and is designed to enable all employees to play a full role in implementing the policy and in achieving the environmental, health and safety targets.

The purpose of an Environmental, Health and Safety Policy is to:

- Foster a responsible concern for the environment, health and safety in all aspects of our business
- Progressively improve the environmental, health and safety impacts which arise as a result of our continual improvement and activities.
- Establish targets of achievement and ownership in each of our companies.

We will ensure the implementation of the Environmental, Health and Safety Policy by achieving of the following objectives.

- Meeting the clients' needs for light with products/services which, throughout their life-cycle, provide the best practicable environmental option.
- The use of materials and processes which embody the best available techniques not entailing excessive cost.
- The efficient use of energy, minimisation of waste and the minimum use of non-renewable resources.
- Compliance with existing and future Environmental, Health and Safety Regulations.
- The use of targets and monitors to measure progress.

The environment, health and safety are of paramount importance. Working together with the community, customers and suppliers, the group is committed to continual improvement in all areas covered by this Policy.



Harald SOMMERER
Chief Executive Officer
Zumtobel Group



Martin BRANDT
Chief Operating Officer
Zumtobel Group

14th February 2012
CORPORATE SOCIAL RESPONSIBILITY

ATTACHMENT C.2



ecolution
An initiative of TRIDONIC

- Our philosophy, our actions,
our solutions.

With ecolution we set new standards in terms of sustainability that far exceed environmental protection.

ecolution is synonymous with our complete strategy of sustainability; a strategy, moreover, that permeates all sectors of our company like a 'green thread'.

ecolution describes the fundamental approach and philosophy of our company: we consider the complete creation and life cycles of our products and services in all aspects of environmental compatibility and economy. This is our motivation and also our source of inspiration.

we set standards that far exceed the protection of the environment, by fulfilling our responsibility to employees, customers, the environment and to society in general.

► **For our common ecological and economic future.**

ecolution
An initiative of TRIDONIC

The principle of ecolution: sustainability in all its facets.

Products

Everyone wins thanks to innovative, customer-oriented technology from Tridonic: both the environment and users. Our energy-efficient products and intelligent lighting management solutions help in saving resources, thus contributing to your own business success.

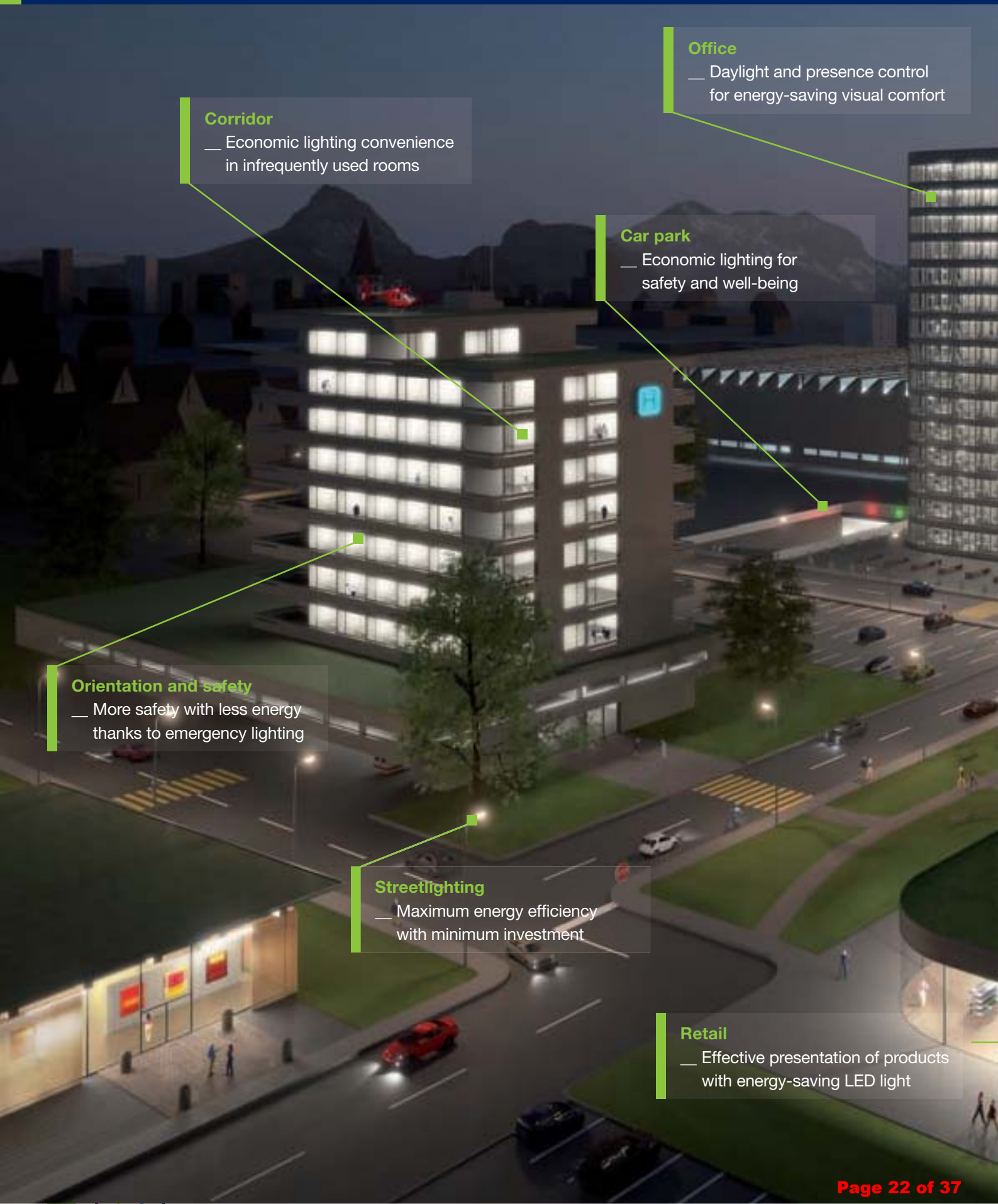
Company

We are fully aware of our responsibility as a globally active concern, which is why a conscientious approach to people, materials and goods is deeply rooted in our corporate culture. Decisions made daily reflect this philosophy.

Application support

Electricity is responsible for approximately 19 % of the world's energy requirements. A large proportion of this can be saved through a combination of modern light sources and innovative lighting management. We can work with you to offer a total solution for any project from the initial planning stage right through to implementation of your lighting installation.

ecolution – discover sustainability



Corridor

— Economic lighting convenience in infrequently used rooms

Office

— Daylight and presence control for energy-saving visual comfort

Car park

— Economic lighting for safety and well-being

Orientation and safety

— More safety with less energy thanks to emergency lighting

Streetlighting

— Maximum energy efficiency with minimum investment

Retail

— Effective presentation of products with energy-saving LED light



Industry and technology

— Energy efficiency for lamps with maximum performance demands

Traffic

— Resource-friendly and durable under arduous conditions

Education

— Room-spanning continuous row systems, controlled according to daylight and presence

Presentation

— Maximum flexibility and minimum energy consumption with LED technology

SUPERMARKET

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ECOLUTION is the integrated sustainability strategy which links all the divisions of our company. We assume responsibility for the environment, society and, above all, our customers. Our ecolution strategy sets new sustainability standards that go far beyond just environmental protection.

TRIDONIC Group helps its customers identify the ideal solution for greater sustainability and efficiency. Energy savings of up to 80 percent can be achieved with lighting management systems and digital dimmable ballasts. Control of the luminaries is demand-led, governed by presence sensors and daylight levels. As part of TRIDONIC's "*ecolution*" sustainability strategy, the "*ecosim*" simulation tool compares different lighting technologies based on life cycle costs, energy profiles and life cycle assessments. This way, the cumulative costs of various solutions can be mapped over several years, helping to define amortization periods and environmental impacts.

Product quality is the top priority for us and is constantly monitored. As part of our Lean Six Sigma philosophy, we also operate a continuous improvement process and adopt **a zero-defect approach**. Our processes are constantly improved and systematically monitored, and the effectiveness of implemented process and quality improvement measures are followed-up through continuous reviews. In the event of any deviation, we instigate corrective measures and monitor their effectiveness. This ensures that resources are used in a sparing, cost-conscious manner throughout the entire life cycle of products, environmental pollution is prevented to the greatest possible extent and risks are minimized. This allows us to guarantee customers the very highest product quality at all times.

The Tridonic Group is determined to make its contribution to climate protection not only by developing innovative products – as a manufacturing company it is also constantly mindful of the need to achieve the biggest possible reductions in emissions.

The Tridonic Group's environmentally relevant emissions include carbon dioxide (CO₂), dust and noise. Measures in the Tridonic Group to cut CO₂ emissions are based primarily on optimising material and energy requirements in the manufacturing process and optimising transport logistics.

Following are the main monitoring areas for GRI Environmental reporting from each locations of the Tridonic Group: (currently monitoring monthly & reporting quarterly)

- Electricity & Gas Consumption
- Water Consumption
- Recyclable Waste
- Residual Waste

Refer attachments of GRI Environmental Performance Reports up to last quarter:

- Attachment C.3 – Environmental Performance Reporting: Auckland-NZ Operations
- Attachment C.4 – Environmental Performance Reporting: Total TRIDONIC Operations

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CORPORATE SOCIAL RESPONSIBILITY

ATTACHMENT C.3

Input for GRI Environmental Performance Reporting - Plant Auckland

Nr.	Indicator	Unit	FY08/09	FY09/10	FY10/11	May 11	Jun 11	Jul 11	Aug 11	Sep 11	Oct 11	Nov 11	Dec 11	Jan 12	Feb 12	Mar 12	Apr 12	FY11/12	Unit	Comments			
EN1	Total Quantity Produced	PCS (Stk)			133,731	11,044	7,640	7,057	4,745	4,368	3,026							0	PCS	Quantity of finished goods manufactured			
		t			1,076	112	85	68	51	59	42								171,611	t	Total weight of finished goods manufactured		
Energy																							
EN3	Oil Consumption	MWh			0	0.000	0.000	0.000	0.000	0.000	0.000							0	MWh	Oil consumption for heating or Diesel fuel (i.e. generator, vehicles excluded)			
	Oil Costs	Euro			0.00	0.00	0.00	0.00	0.00	0.00	0.00							0.00	Euro	Oil costs for heating and Diesel fuel (i.e. power generator, vehicles excluded)			
	Gas Consumption	MWh			919	91.194	63.876	62.667	64.631	53.266	41.622								0	MWh	Gas (Natural gas and liquid petrol gas)		
	Gas Costs	Euro			27,656.11	2,787.37	2,105.82	2,065.30	2,272.34	1,851.59	1,494.72								1,296.29	Euro	Costs of Gas (Natural gas and liquid petrol gas)		
	Direct Energy Consumption	MWh	0	0	919	91	64	63	65	53	42	0	0	0	0	0	0	0	40,233	MWh	Total direct energy consumption		
	Total Direct Energy Costs	Euro	0	0	27,656	2,787	2,106	2,065	2,272	1,852	1,495	0	0	0	0	0	0	0	1,296	Euro			
	Consumption / produced unit	MWh/1000 PCS	#DIV/0!	#DIV/0!	6.872	8.257	8.361	8.880	13.621	12.195	13.755	0	0	0	0	0	0	0	0	MWh/U	Direct energy consumption per produced unit		
EN4	Electricity Consumption	MWh			360	35.662	30.515	26.665	28.263	23.633	20.463								72	MWh	Electricity		
	Electricity Costs	Euro			33,777.69	3,824.44	3,738.98	3,959.37	3,653.70	2,762.93	2,092.63								525.49	Euro	Costs of electricity		
	District heating Consumption	MWh			0	0.000	0.000	0.000	0.000	0.000	0.000								53,810	MWh	District heating		
	District heating Costs	Euro			0.00	0.00	0.00	0.00	0.00	0.00	0.00								0.00	Euro	Costs of district heating		
	Total Indirect Energy Consumption	MWh	0	0	360	36	31	27	28	24	20	0	0	0	0	0	0	0	0	MWh	Total indirect energy consumption		
	Total Indirect Energy Costs	Euro	0	0	33,777.69	3,824.44	3,738.98	3,959.37	3,653.70	2,762.93	2,092.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00	525.49	Euro			
	Consumption / produced unit	MWh/1000 PCS	#DIV/0!	#DIV/0!	2.694	3.229	3.994	3.779	5.956	5.410	6.762	0	0	0	0	0	0	0	0	MWh/U	Indirect energy consumption per produced unit		
Water																							
EN8	Water Consumption	m³			770	55	55	55	79	79	79								0	m³	Water consumption from public water supply (if appropriate also ground water and rain water)		
	Water Costs	Euro			1,602.65	33.98	33.98	33.98	54.50	54.50	54.50								1,173.27	Euro	Costs of Water consumption from public water supply (if appropriate also ground water and rain water)		
	Consumption / produced unit	m³/1000 PCS	#DIV/0!	#DIV/0!	5.760	4.980	7.199	7.794	16.719	18.162	26.216	0	0	0	0	0	0	0	0	0	m³/U	Water consumption per produced unit	
Emissions, Effluents and Waste																							
EN16	Oil CO ₂ -Factor	t/MWh			0	0.000	0.000	0.000	0.000	0.000	0.000								0	t/MWh	Oil for heating - see sheet "Conversion"		
	Oil CO ₂ -Emission	t	0	0	0	0	0	0	0	0	0								0	t	Oil for heating		
	Gas CO ₂ -Factor	t/MWh			0.199	0.199	0.199	0.199	0.199	0.199	0.199									0	t/MWh	Gas (Natural gas and liquid petrol gas) - see sheet "Conversion"	
	Gas CO ₂ -Emission	t	0	0	183	18	13	12	13	11	8	0	0	0	0	0	0	0	1	t	Gas (Natural gas and liquid petrol gas)		
	Total indirect CO ₂ -Emission	t	0	0	183	18	13	12	13	11	8	0	0	0	0	0	0	0	0	258	t	Total direct CO ₂ -Emission	
	Direkt CO ₂ -Emission	t/1000 PCS	#DIV/0!	#DIV/0!	1.368	1.643	1.664	1.767	2.711	2.427	2.737	0	0	0	0	0	0	0	0	0	0	t/U	Direct CO ₂ -Emission per produced unit
	Electricity CO ₂ -equivalent	t/MWh			0.438	0.197	0.197	0.197	0.197	0.197	0.197									0.023	t/MWh	Electricity (figures from local power contractor or see sheet "Conversion")	
	Electricity CO ₂ -Emission	t	0	0	158	7	6	5	6	5	4	0	0	0	0	0	0	0	0	2	t	Electricity	
	District Heating CO ₂ -equivalent	t/MWh			0	0.000	0.000	0.000	0.000	0.000	0.000									0.000	t/MWh	District heating - (figures from local power contractor)	
	District Heating CO ₂ -Emission	t	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	t	District heating	
	Total indirect CO ₂ -Emission	t	0	0	158	7	6	5	6	5	4	0	0	0	0	0	0	0	0	2	t	Total indirect CO ₂ -Emission	
Indirect CO ₂ -Emission	t/1000PCS	#DIV/0!	#DIV/0!	1.180	0.636	0.787	0.744	1.173	1.066	1.332	0	0	0	0	0	0	0	0	0	0	t/U	Indirect CO ₂ -Emission per produced unit	
Total CO ₂ -Emission	t	0	0	341	25	19	18	18	15	12	0	0	0	0	0	0	0	0	0	0	Total CO ₂ -Emission		
Total CO ₂ -Emission	t/1000PCS	0	0	2.548	2.279	2.451	2.512	3.884	3.493	4.069	0	0	0	0	0	0	0	0	0	0	Total CO ₂ -Emission		
EN21	Water Discharge	m³			715	55	55	55	79	79	79								19	m³	Water discharge (same as water consumption EN8 as not significant different)		
	Water Discharge Costs	Euro			0.00	84.98	84.98	84.98	133.75	133.75	133.75								1,117.97	Euro	Costs of water discharge		
	Discharge / produced unit	m³/1000 PCS	#DIV/0!	#DIV/0!	5.346	4.980	7.199	7.794	16.719	18.162	26.216	0	0	0	0	0	0	0	0	0	m³/1000 PCS	Water discharge per produced unit	
EN22	Recyclable Waste	kg			91,778	8,126	7,097	7,372	5,225	6,413	5,270								86	kg	Recycling material (metals, carton, plastics, ...)		
	Recyclable Waste Costs	Euro			-80,185.48	-5,418.20	-2,954.86	-3,869.68	-3,878.67	-4,456.44	-1,717.79								#####	Euro	Costs / revenues, credits of recycling material (metals, carton, plastics, ...) incl. transport and rent of waste container		
	Residual waste	kg			54,000	4,500	4,500	4,500	4,500	4,500	4,500								-102,481	kg	Residual materials / waste. Costs incl. transport and rent of waste container		
	Residual waste Costs	Euro			5,821.79	459.10	483.38	507.68	512.64	499.37	478.70								81,000.00	Euro	Residual materials / waste. Costs incl. transport and rent of waste container		
	Hazardous waste	kg			768	0	0	0	0	0	0								8,763	kg	Hazardous waste (i.e. waste oil, solvents, varnish,...). Costs incl. transport and rent of waste container		
	Hazardous waste Costs	Euro			486.99	0.00	0.00	0.00	0.00	0.00	0.00								768.00	Euro	Hazardous waste (i.e. waste oil, solvents, varnish,...). Costs incl. transport and rent of waste container		
	Total Waste	kg	0	0	146,546	12,626	11,597	11,872	9,725	10,913	9,770	0	0	0	0	0	0	0	0	487	kg	Total Waste	
Total Waste Costs	Euro	0	0	-73,877	-4,959	-2,471	-3,362	-3,366	-3,957	-1,239	0	0	0	0	0	0	0	0	213,050	Euro	Total costs of waste		
Waste / produced unit	kg/1000 PCS	#DIV/0!	#DIV/0!	1,095.829	1,143.2452	1,517.952	1,682.301	2,049.526	2,498.397	3,228.685	0	0	0	0	0	0	0	0	0	0	Waste per produced unit		

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CORPORATE SOCIAL RESPONSIBILITY

ATTACHMENT C.4

Input for GRI Environmental Performance Reporting - Total Operation Tridonic

Nr.	Indicator	Unit	FY08/09	FY09/10	FY10/11	Unit	Comments	
EN1	Total Quantity Produced	PCS (Stk)	270,445,854	283,685,902	269,489,285	PCS	Quantity of finished goods manufactured	
		t	7,834	4,625	2,133,435	t	Total weight of finished goods manufactured	
Energy								
EN3	Direct energy consumption by primary energy source	Oil Consumption	MWh	847	769	1,111	MWh	Oil consumption for heating or Diesel fuel (i.e. generator; vehicles excluded)
		Oil Costs	Euro	0	0	72,001	Euro	Oil costs for heating and Diesel fuel (i.e. power generator; vehicles excluded)
		Gas Consumption	MWh	7,681	6,935	6,897	MWh	Gas (Natural gas and liquid petrol gas)
		Gas Costs	Euro	115,011	67,068	220,883	Euro	Costs of Gas (Natural gas and liquid petrol gas)
		Direct Energy Consumption	MWh	8,528	7,704	8,008	MWh	Total direct energy consumption
		Total Direct Energy Costs	Euro	115,011	67,068	292,883	Euro	
		Consumption / produced unit	MWh/1000 PCS	0.032	0.027	0.030	MWh/1000 PCS	Direct energy consumption per produced unit
EN4	Indirect energy consumption by primary source	Electricity Consumption	MWh	30,788	29,059	30,594	MWh	Electricity
		Electricity Costs	Euro	718,354	627,530	2,485,437	Euro	Costs of electricity
		District heating Consumption	MWh	0	0	0	MWh	District heating
		District heating Costs	Euro	0	0	0	Euro	Costs of district heating
		Total Indirect Energy Consumption	MWh	30,788	29,059	30,594	MWh	Total indirect energy consumption
		Total Indirect Energy Costs	Euro	718,354	627,530	2,485,437	Euro	
		Consumption / produced unit	MWh/1000 PCS	0.114	0.102	0.114	MWh/1000 PCS	Indirect energy consumption per produced unit
Water								
EN8	Total water withdrawal by source	Water Consumption	m³	28,904	27,244	302,220	m³	Water consumption from public water supply (if appropriate also ground water and rain water)
		Water Costs	Euro	9,533	5,269	42,638	Euro	Costs of Water consumption from public water supply (if appropriate also ground water and rain water)
		Consumption / produced unit	m³/1000 PCS	0.107	0.096	1.121	m³/1000 PCS	Water consumption per produced unit
Emissions, Effluents and Waste								
EN16	Total direct and indirect greenhouse gas emissions by weight	Oil CO ₂ -Factor	t/MWh	0.280	0.280	0.280	t/MWh	Oil for heating - see sheet "Conversion"
		Oil CO ₂ -Emission	t	237	215	311	t	Oil for heating
		Gas CO ₂ -Factor	t/MWh	0.122	0.226	0.123	t/MWh	Gas (Natural gas and liquid petrol gas) - see sheet "Conversion"
		Gas CO ₂ -Emission	t	937	930	849	t	Gas (Natural gas and liquid petrol gas)
		Total direct CO ₂ -Emission	t	1,174	1,145	1,160	t	Total direct CO₂-Emission
		Direct CO ₂ -Emission per produced unit	t/1000 PCS	0.004	0.004	0.004	t/1000 PCS	Direct CO₂-Emission per produced unit
		Electricity CO ₂ -equivalent	t/MWh	0.332	0.310	0.389	t/MWh	Electricity: (figures from local power contractor or see sheet "Conversion")
		Electricity CO ₂ -Emission	t	10,222	9,008	11,896	t	Electricity
		District Heating CO ₂ -equivalent	t/MWh	0.000	0.000	0	t/MWh	District heating - (figures from local power contractor)
		District Heating CO ₂ -Emission	t	0	0	0	t	District heating
		Total indirect CO ₂ -Emission	t	10,222	9,008	11,896	t	Total indirect CO₂-Emission
		Indirect CO ₂ -Emission per produced unit	t/1000PCS	0.038	0.032	0.044	t/1000PCS	Indirect CO₂-Emission per produced unit
	Total CO ₂ -Emission	t	11,396	10,153	13,056	t	Total CO₂-Emission	
	Total CO ₂ -Emission	t/1000PCS	0.042	0.036	0.048	t/1000PCS	Total CO₂-Emission	
EN21	Total water discharge by quality and destination	Water Discharge	m³	28,904	27,244	302,220	m³	Water discharge (same as water consumption EN8 as not significant different)
		Water Discharge Costs	Euro	9,533	5,269	37,020	Euro	Costs of water discharge
		Discharge / produced unit	m³/1000 PCS	0.107	0.096	1.121	m³/1000 PCS	Water discharge per produced unit
EN22	Total weight of waste by type and disposal method	Recyclable Waste	kg	4,662,753	4,021,781	4,068,210	kg	Recycling material (metals, carton, plastics, ...)
		Recyclable Waste Costs	Euro			-1,037,265	Euro	Costs / revenues, credits of recycling material (metals, carton, plastics, ...) incl. transport and rent of waste container
		Residual waste	kg	265,542	307,188	342,914	kg	Residual materials / waste. Costs incl. transport and rent of waste container
		Residual waste Costs	Euro			63,576	Euro	Residual materials / waste. Costs incl. transport and rent of waste container
		Hazardous waste	kg	59,104	49,043	56,746	kg	Hazardous waste (i.e. waste oil, solvents, varnish,...). Costs incl. transport and rent of waste container
		Hazardous waste Costs	Euro			13,979	Euro	Hazardous waste (i.e. waste oil, solvents, varnish,...). Costs incl. transport and rent of waste container
			Total Waste	kg	4,987,399	4,378,012	4,467,871	kg
	Total Waste Costs	Euro	0	0	-959,709	Euro	Total costs of waste	
	Waste / produced unit	kg/1000 PCS	18.441	15.433	16.579	kg/1000 PCS	Waste per produced unit	

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CORPORATE SOCIAL RESPONSIBILITY

Global Compact Area – Anti-Corruption

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

Our businesses are against all forms of Corruption:

New Zealand does not have any one single agency tasked with fighting corruption. Unlike many other countries it has not seen the need to create an Independent Commission against Corruption. Rather it has a number of agencies that focus on the different elements in the fight against corruption. Some of these agencies have their focus on the more positive task of reinforcing values to ensure that New Zealand maintains a corruption free environment; others focus on the enforcement of the laws and the rules.

Transparency International (www.transparency.org) is the global civil society organisation, leading the fight against corruption. Transparency International's mission is to create change towards a world free of corruption. Transparency International's Corruption Perceptions Index (CPI) was first launched in 1995; it has been widely credited with putting the issue of corruption on the international policy agenda. The CPI ranks almost 200 countries by their perceived levels of corruption, as determined by expert assessments and opinion surveys.

New Zealand is keeping its No.1 position with least corruption nation and very clean image in public sector for consecutive 6th years in row. (Year 2006 to 2011)
http://www.transparency.org/policy_research/surveys_indices/cpi

Background:

Tridonic 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

The Zumtobel Group's Corporate Values, Code of Conduct and Corporate Policies are binding for all the Group's employees. These lay the foundation for taking the right decisions and acting in a fair, trustworthy and unprejudiced fashion towards both colleagues and business partners. Tridonic NZ is part of the Zumtobel Group's Code of Conduct which contains detailed regulations on corruption (refer to Attachment D) which all employees must observe as well as other sensitive issues such as:

- Sponsorship
- political and charitable donations

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CORPORATE SOCIAL RESPONSIBILITY

- and relations with the authorities

Objective:

We believe that “*Corruption is the abuse of entrusted power for private gain*”. It hurts everyone whose life, livelihood or happiness depends on the integrity of people in a position of authority.

Tridonic 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 Tridonic 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 Tridonic 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 Tridonic NZ is a member, is to actively combat the various forms of corruption in international and national business dealings.

Target:

Do note, as an international company, we currently have an independent 3rd party audit carried out on a yearly basis. Fraud and corruption is an important component of this audit. Nevertheless, we will try and further improve by identifying key areas which might be susceptible to fraud and corruption in our business and rectify it.

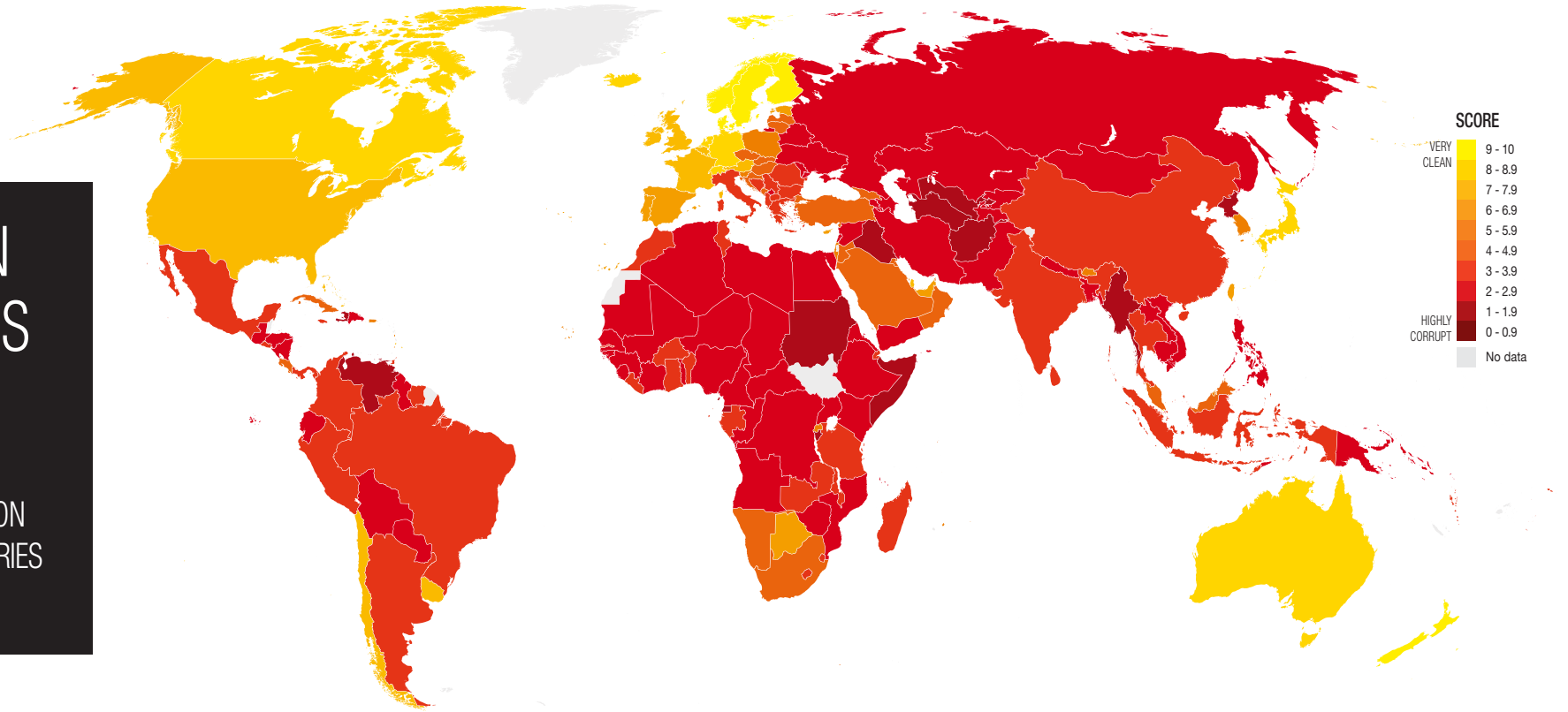
In the Zumtobel Group we will not tolerate any form of corruption; regardless of the value or nature of the advantage this involves (cash, benefits in kind, etc.).

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ATTACHMENT D

CORRUPTION PERCEPTIONS INDEX 2011

THE PERCEIVED LEVELS OF PUBLIC-SECTOR CORRUPTION IN 183 COUNTRIES/TERRITORIES AROUND THE WORLD



RANK	COUNTRY/TERRITORY	SCORE
1	New Zealand	9.5
2	Denmark	9.4
2	Finland	9.4
4	Sweden	9.3
5	Singapore	9.2
6	Norway	9.0
7	Netherlands	8.9
8	Australia	8.8
8	Switzerland	8.8
10	Canada	8.7
11	Luxembourg	8.5
12	Hong Kong	8.4
13	Iceland	8.3
14	Germany	8.0
14	Japan	8.0
16	Austria	7.8
16	Barbados	7.8
16	United Kingdom	7.8
19	Belgium	7.5
19	Ireland	7.5
21	Bahamas	7.3
22	Chile	7.2
22	Qatar	7.2
24	United States	7.1

25	France	7.0
25	Saint Lucia	7.0
25	Uruguay	7.0
28	United Arab Emirates	6.8
29	Estonia	6.4
30	Cyprus	6.3
31	Spain	6.2
32	Botswana	6.1
32	Portugal	6.1
32	Taiwan	6.1
35	Slovenia	5.9
36	Israel	5.8
36	Saint Vincent and the Grenadines	5.8
38	Bhutan	5.7
39	Malta	5.6
39	Puerto Rico	5.6
41	Cape Verde	5.5
41	Poland	5.5
43	Korea (South)	5.4
44	Brunei	5.2
44	Dominica	5.2
46	Bahrain	5.1
46	Macau	5.1

RANK	COUNTRY/TERRITORY	SCORE
46	Mauritius	5.1
49	Rwanda	5.0
50	Costa Rica	4.8
50	Lithuania	4.8
50	Oman	4.8
50	Seychelles	4.8
54	Hungary	4.6
54	Kuwait	4.6
56	Jordan	4.5
57	Czech Republic	4.4
57	Namibia	4.4
57	Saudi Arabia	4.4
60	Malaysia	4.3
61	Cuba	4.2
61	Latvia	4.2
61	Turkey	4.2
64	Georgia	4.1
64	South Africa	4.1
66	Croatia	4.0
66	Montenegro	4.0
66	Slovakia	4.0
69	Ghana	3.9
69	Italy	3.9
69	FYR Macedonia	3.9

69	Samoa	3.9
73	Brazil	3.8
73	Tunisia	3.8
75	China	3.6
75	Romania	3.6
77	Gambia	3.5
77	Lesotho	3.5
77	Vanuatu	3.5
80	Colombia	3.4
80	El Salvador	3.4
80	Greece	3.4
80	Morocco	3.4
80	Peru	3.4
80	Thailand	3.4
86	Bulgaria	3.3
86	Jamaica	3.3
86	Panama	3.3
86	Serbia	3.3
86	Sri Lanka	3.3
91	Bosnia and Herzegovina	3.2
91	Liberia	3.2
91	Trinidad and Tobago	3.2
91	Zambia	3.2
95	Albania	3.1

95	India	3.1
95	Kiribati	3.1
95	Swaziland	3.1
95	Tonga	3.1
100	Argentina	3.0
100	Benin	3.0
100	Burkina Faso	3.0
100	Djibouti	3.0
100	Gabon	3.0
100	Indonesia	3.0
100	Madagascar	3.0
100	Malawi	3.0
100	Mexico	3.0
100	Sao Tome and Principe	3.0
100	Suriname	3.0
100	Tanzania	3.0
112	Algeria	2.9
112	Egypt	2.9
112	Kosovo	2.9
112	Moldova	2.9
112	Senegal	2.9
112	Vietnam	2.9
118	Bolivia	2.8
118	Mali	2.8

120	Bangladesh	2.7
120	Ecuador	2.7
120	Ethiopia	2.7
120	Guatemala	2.7
120	Iran	2.7
120	Kazakhstan	2.7
120	Mongolia	2.7
120	Mozambique	2.7
120	Solomon Islands	2.7
129	Armenia	2.6
129	Dominican Republic	2.6
129	Honduras	2.6
129	Philippines	2.6
129	Syria	2.6
134	Cameroon	2.5
134	Eritrea	2.5
134	Guyana	2.5
134	Lebanon	2.5
134	Maldives	2.5
134	Nicaragua	2.5
134	Niger	2.5
134	Pakistan	2.5
134	Sierra Leone	2.5
143	Azerbaijan	2.4

143	Belarus	2.4
143	Comoros	2.4
143	Mauritania	2.4
143	Nigeria	2.4
143	Russia	2.4
143	Timor-Leste	2.4
143	Togo	2.4
143	Uganda	2.4
152	Tajikistan	2.3
152	Ukraine	2.3
154	Central African Republic	2.2
154	Congo Republic	2.2
154	Côte d'Ivoire	2.2
154	Guinea-Bissau	2.2
154	Kenya	2.2
154	Laos	2.2
154	Nepal	2.2
154	Papua New Guinea	2.2
154	Paraguay	2.2
154	Zimbabwe	2.2
164	Cambodia	2.1
164	Guinea	2.1
164	Kyrgyzstan	2.1
164	Yemen	2.1

168	Angola	2.0
168	Chad	2.0
168	Democratic Republic of the Congo	2.0
168	Libya	2.0
172	Burundi	1.9
172	Equatorial Guinea	1.9
172	Venezuela	1.9
175	Haiti	1.8
175	Iraq	1.8
177	Sudan	1.6
177	Turkmenistan	1.6
177	Uzbekistan	1.6
180	Afghanistan	1.5
180	Myanmar	1.5
182	Korea (North)	1.0
182	Somalia	1.0

Code of Conduct

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4 CORRUPTION

4.1 BASIC PRINCIPLES

Bribery, 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 made a clear **commitment to introducing anti-corruption regulations for all business dealings, transactions and processes in all Zumtobel Group companies worldwide.**

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

The following provisions govern transactions or situations involving Zumtobel Group employees or external third parties acting on behalf of the Zumtobel Group. The Zumtobel Group cannot, however, accept any responsibility or liability whatsoever for corrupt conduct on the part of external third parties (e.g. suppliers, customers, etc.).

4.2 BRIBERY

For the purposes of this Code of Conduct, the Zumtobel Group understands as bribery the

- offering
 - promising
 - giving
 - demanding, or
 - accepting
- of financial or other advantage to or from
- public officials
 - politicians, political parties and/or their representatives, or
 - other external third parties

in order to obtain or retain business or to secure any other improper advantage in the conduct of business.

The Zumtobel Group expressly prohibits its employees from engaging any form of bribery, regardless of the value or type of benefit involved (cash, benefits in kind, etc.).

Employees who fail to observe this prohibition will face strict disciplinary measures and/or civil/criminal proceedings.

If Zumtobel Group employees are subjected to attempted bribery or suspect an attempt at securing inappropriate influence by an external third party, they should contact their supervisor or the Ethics Officer immediately.

4.3 FACILITATION PAYMENTS

In contrast to bribery, “facilitation payments” are made in order to expedite the performance of legal and routine activities by public officials (e.g. customs procedures, the routine issuing of entry documents at airports, etc.). The sums involved are generally very small (a few Euro).

In some countries such facilitation payments to officials are standard practice. Nonetheless they are generally illegal – and in any case they contravene the ethical principles by which the Zumtobel Group’s activities are governed. **For this reason, in the Zumtobel Group no facilitation payments are made.**

If Zumtobel Group employees are requested to make facilitation payments, they should in all cases inform their supervisor or the Ethics Officer – after the fact, if no other option is available. The aim in this case is to make such practices transparent and verifiable.

4.4 GIFTS, HOSPITALITY, ESTABLISHING BUSINESS RELATIONSHIPS

The Zumtobel Group prohibits the offering or receipt of gifts, hospitality or other benefits, if the aim of these offerings is to influence business transactions in an improper and unethical way, or even if they could merely create an impression of such improper influence.

As part of the Zumtobel Group’s commitment to maintaining good relationships with its business partners, employees may accept or present occasional **modest** gifts or hospitality (e.g. invitation to a business meal, standard promotional gifts such as pens, calendars, etc.), provided these:

- are legal
- are standard practice in the relevant country or sector and remain within the bounds of good taste
- are made in connection with a business relationship and in good faith
- do not intend – or even give the impression of intending – to exert an improper influence on business decisions
- would not present the Zumtobel Group in a negative, reprehensible or embarrassing light if they were made public.

Gifts in the form of cash or its equivalents (e.g. cheques, bank transfers, etc.) may **in no case** be offered or accepted, even if the sums involved are small.

The principles outlined in this paragraph also apply when establishing new business relationships.

4.5 CHARITY DONATIONS

Donations to charitable institutions must be approved by the Zumtobel Group Executive Board if any of the following apply:

- the sum donated is greater than EUR 5,000
- the donation is made to globally active organisations, e.g. UNICEF, Amnesty International, Médecins Sans Frontières, etc.
- the donation relates to major (global) disasters (e.g. earthquakes, floods or similar) or other events which may be of relevance to the Zumtobel Group as a whole.

All other charitable donations should be handled within the framework of the relevant budget and the relevant policies and regulations.

4.6 SPONSORSHIP

The Zumtobel Group pursues a very active policy of arts sponsorship which is to be implemented within the framework of Group strategy, the relevant policies and regulations, and approved marketing and communications budgets. The following points should always be observed:

- the sponsorship contribution should not exercise any influence over future decisions taken by the recipient (e.g. the awarding of contracts)
- all sponsorship contributions should be verifiable and fully documented.

In addition to arts sponsorship, the Zumtobel Group also provides special support for the creation of training and employment opportunities for people with disabilities. Financial or other contributions donated or provided in this area should be handled in exactly the same way as sponsorship of the arts.

Any other sponsorships, e.g. of sports teams, schools, sporting or other events, must receive prior written approval from the management of the relevant Division or the Executive Board of the Zumtobel Group.

4.7 POLITICAL DONATIONS

Donations or other payments to political parties, whether they are made directly or indirectly, are **prohibited**.

Employees are free to engage in private political activities provided:

- these private political activities are legal
- all private political activities take place outside working hours
- no resources belonging to the Zumtobel Group are used for these private political activities
- the private political activities have no negative impact of any kind on the Zumtobel Group.

4.8 MONEY LAUNDERING

People and organisations involved in criminal activities (such as drug dealing, bribery, fraud, extortion, etc.) often attempt to “launder” the proceeds of these activities in order to conceal them from the authorities or disguise them as legitimate income. In most countries of the world money laundering is prohibited by law.

The Zumtobel Group is committed to full compliance with all applicable legislation against money laundering. For this reason, the Zumtobel Group only enters into business relationships with reputable customers or other business partners who are exclusively engaged in legitimate businesses and whose funds derive from legal sources.

Consequently, all Zumtobel Group Divisions must ensure that they do not accept any revenues which have any connection with money laundering activities. In cases of doubt, a careful investigation must be conducted (in accordance with the principles of due diligence – see Glossary) in order to gather as much information as possible about the relevant business partner.

If there is any suspicion or indication that a business partner is engaged in money laundering or other illegal activities, the Ethics Officer must be contacted immediately.

4.9 RELATIONS WITH THE AUTHORITIES

In most countries around the world there is strict legislation governing the acceptance of gifts or bribes by the authorities.

Employees of the Zumtobel Group may not promise, offer or give to public officials any cash payments or similar with the intention of securing preferential treatment or exercising improper influence on official decisions.