

23rd January 2010

Secretary-General
United Nations
New York, NY 10017
USA

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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 <http://www.tridonicatco.com>.

We trust the above are in order.

Sincerely yours,



Mr. Paul de Knegt
Managing Director
TridonicAtco NZ Ltd



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.

Human Rights Target:

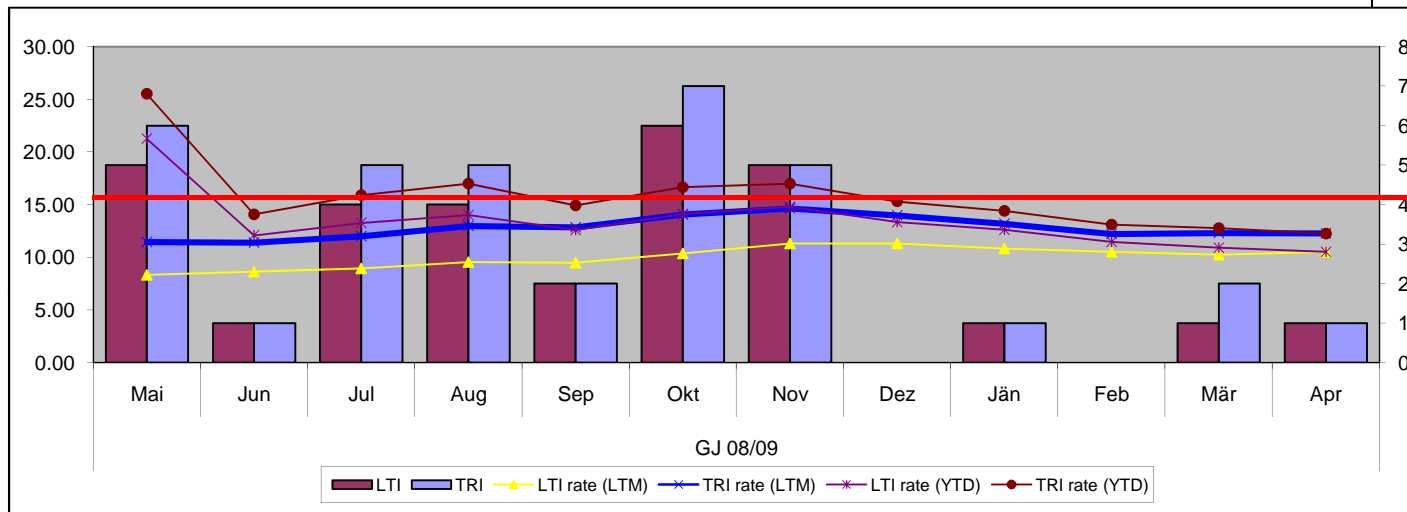
TridonicAtco NZ is currently monitoring our injury rates on a monthly / yearly basis. Please refer to attachment A.1 and A.2 on the following pages for safety reports for Tridonic Atco Global Operations and TridonicAtco NZ for the period May 2008 to April 2009. By preventative and corrective actions throughout the year TridonicAtco NZ is targeting to reduce the number of injury rates for the upcoming year.

ATTACHMENT A.1

Safety Report for Global Operations for Period May 2008 to April 2009

Safety Report: TridonicAtco Ops.

TridonicAtco Op:



Target GJ09/10 : LTM TRI <9,5

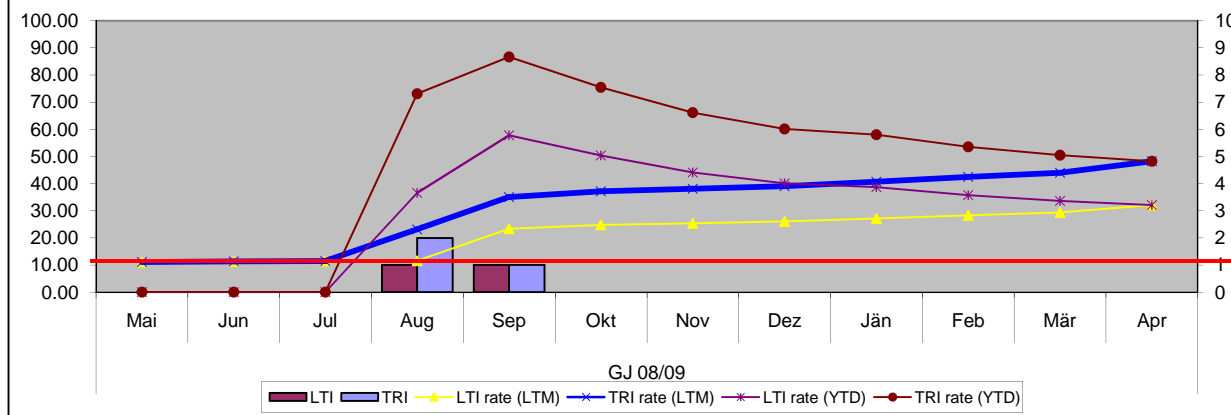
LTI: Lost Time Injury
 TRI: Total Recordable Injury
 LTM: Last Month
 YTD: Year To Date

	GJ 08/09											
	Mai	Jun	Jul	Aug	Sep	Okt	Nov	Dez	Jän	Feb	Mär	Apr
LTI	5	1	4	4	2	6	5	0	1	0	1	1
TRI	6	1	5	5	2	7	5	0	1	0	2	1
hours	235,147	261,645	257,268	245,579	271,996	288,550	264,169	199,964	196,569	220,497	220,161	192,099
LTI rate (month)	21.3	3.8	15.5	16.3	7.4	20.8	18.9	0.0	5.1	0.0	4.5	5.2
TRI rate (month)	25.5	3.8	19.4	20.4	7.4	24.3	18.9	0.0	5.1	0.0	9.1	5.2
LTI rate (LTM)	8.33	8.64	8.93	9.55	9.48	10.38	11.32	11.31	10.82	10.51	10.26	10.51
TRI rate (LTM)	11.45	11.40	12.02	12.96	12.87	14.06	14.65	13.97	13.19	12.20	12.31	12.27
LTI rate (YTD)	21.26	12.08	13.26	14.01	12.58	14.10	14.80	13.34	12.61	11.47	10.90	10.51
TRI rate (YTD)	25.52	14.09	15.91	17.01	14.94	16.66	16.99	15.31	14.41	13.11	12.77	12.27

ATTACHMENT A.2

Safety Report for TridonicAtco NZ Auckland Plant for Period May 2008 to April 2009

Safety Report: Auckland Plant Auckland



Target GJ09/10 : LTM TRI <13

LTI: Lost Time Injury
 TRI: Total Recordable Injury
 LTM: Last Month
 YTD: Year To Date

	GJ 08/09											
	Mai	Jun	Jul	Aug	Sep	Okt	Nov	Dez	Jän	Feb	Mär	Apr
LTI	0	0	0	1	1	0	0	0	0	0	0	0
TRI	0	0	0	2	1	0	0	0	0	0	0	0
hours	7,036	5,849	8,251	6,208	7,292	5,129	5,606	4,563	1,754	4,295	3,464	2,780
LTI rate (month)	0.0	0.0	0.0	161.1	137.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
TRI rate (month)	0.0	0.0	0.0	322.2	137.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
LTI rate (LTM)	11.15	11.30	11.43	23.13	35.04	37.16	38.10	39.09	40.73	42.42	44.02	48.21
TRI rate (LTM)	11.15	11.30	11.43	23.13	35.04	37.16	38.10	39.09	40.73	42.42	44.02	48.21
LTI rate (YTD)	0.00	0.00	0.00	36.57	57.74	50.30	44.08	40.05	38.69	35.72	33.64	32.14
TRI rate (YTD)	0.00	0.00	0.00	73.14	86.62	75.44	66.12	60.08	58.04	53.59	50.46	48.21

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.

Labour Target:

The Zumtobel Group of which TridonicAtco NZ is a member of, has a code of conduct which everyone in the Zumtobel Group adheres to. 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 TridonicAtco NZ has been provided in the table below:

Age	No of Employees
18 -20	4
21-30	15
31-40	11
41-50	11
51-60	10

This clearly establishes that TridonicAtco NZ does not discriminate against age & does not tolerate child labour. As a target in this section, we would like to ensure that we only do business with companies that treat labour issues as seriously as we do.

ATTACHMENT B

Code of Conduct

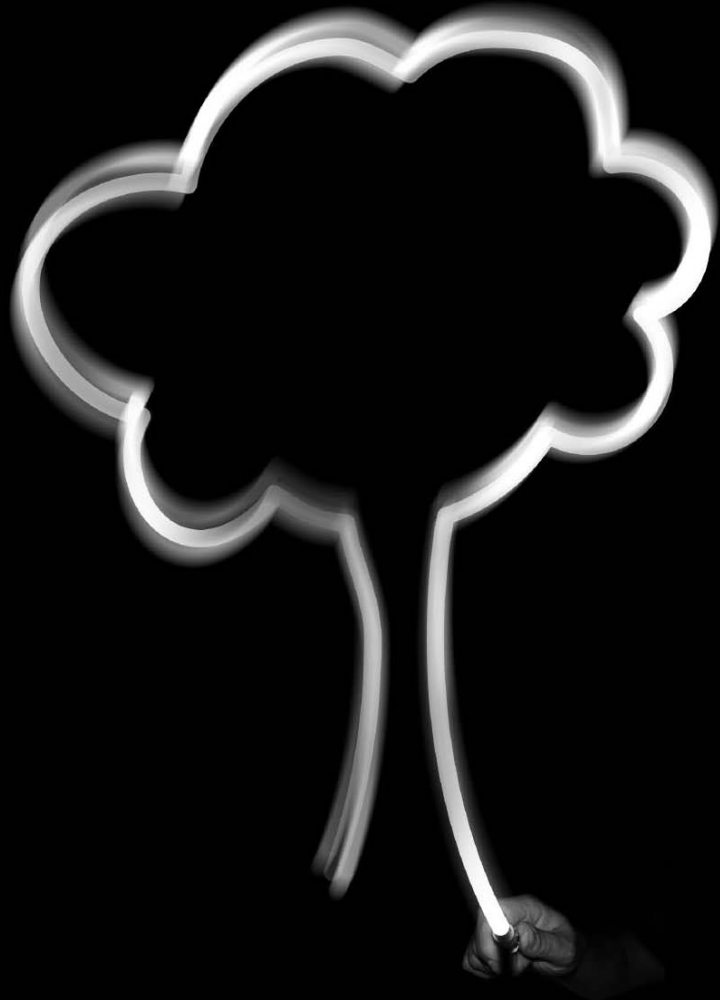
A hand is shown writing the words "Code of Conduct" in a white, cursive script on a dark red background. The text is positioned on the left side of the image, with the hand visible at the end of the word "Conduct".

TABLE OF CONTENTS

1	Introduction	5
2	General principles	7
2.1	Scope and application	7
2.2	Responsibility of all Zumtobel Group employees	7
3	Communications	9
3.1	Basic principles	9
3.2	Communications with customers	9
3.3	Communications with suppliers	10
3.4	Communications with the authorities	10
3.5	Communications with the media	11
3.6	Communications with competitors	11
3.7	Communications within the Zumtobel Group	11
4	Corruption	13
4.1	Basic principles	13
4.2	Bribery	13
4.3	Facilitation payments	14
4.4	Gifts, hospitality, establishing business relationships	14
4.5	Charity donations	15
4.6	Sponsorship	15
4.7	Political donations	16
4.8	Money laundering	16
4.9	Relations with the authorities	17
5	Confidentiality and protection of corporate property	19
5.1	Basic principles	19
5.2	Classification of corporate information	19
5.3	Insider information	20
5.4	Corporate property	20
5.5	E-mail, intranet and Internet	21
6	Social responsibility and environmental protection	23
6.1	Basic principles	23
6.2	Working conditions	23
6.3	Misuse of alcohol and drugs	23
6.4	Sexual harassment	24
6.5	Discrimination	24
6.6	Environment, health and safety	25
7	Rules of competition	27
7.1	Basic principles	27
7.2	Unfair competition	27
7.3	Behaviour towards customers	28
7.4	Behaviour towards suppliers	29
7.5	Behaviour towards competitors	29
8	Protection of intellectual property	31
9	Conflict of interests	33
10	Compliance with the Code of Conduct	35
10.1	Basic principles	35
10.2	Ethics Officer	35
11	Reporting breaches of conduct	36
12	Glossary	39

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.

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.

Environment Target:

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

Our Ecolution projects focus taking into consideration the energy and carbon footprints of products during the design phase. LED Talex is one of the innovative solutions that has come from this process.

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.



Andreas J. LUDWIG
Chief Executive Officer
Zumtobel Group



Martin BRANDT
Chief Operating Officer
Zumtobel Group



Thomas SPITZENPFEIL
Chief Financial Officer
Zumtobel Group

ATTACHMENT C.2

Lighting and sustainability

90% of energy is consumed during product application



Use of materials

1 %

- Compliance with REACH and RoHS
- Use of recycled and recyclable materials
- Reduction of hazardous substances



Manufacturing

7 %

- ISO 14.001
- Ökoprofit Dornbirn



Transport

1 %

- Double stacking

Biggest factor!



Lighting solution

90 %

- Green Building, Minergie, LEED, DGNB, ÖGNI, BREEAM
- Compliance with EuP, CE, ENEC
- ISO 12646, EN 15193



Recycling

1 %

- Compliance with WEEE, Batteries Directive and Packaging Directive



ecolution – a new way of thinking is conquering the world.

www.tridonicatco.com

Every company has a responsibility to our environment. With its ideas and products, TridonicAtco is making sustainable contribution to the protection of natural resources. Thanks to digital dimmable ballasts and effective lighting management, up to 80% energy and enormous quantities of CO₂ can be saved with sophisticated lighting solutions. The LED sector is also making a valuable contribution thanks to the outstanding energy balance of LEDs. We have given this way of thinking a name: ecolution.

a world of bright ideas®

TRIDONIC.ATCO



It is up to us to design our world.

We are living in a time of tremendous changes. Conventional sources of energy are beginning to run out. New ideas and new concepts are needed, because protecting our environment has become an important competitive factor. TridonicAtco is already making a substantial contribution to conserving resources and promoting sustainability.

1 Dimming and Controls: **more convenience, more energy saving**

Lighting alone is responsible for 19 % of the world's electricity demand. Energy-saving systems are required. TridonicAtco has been making targeted investments towards the development of new environmentally friendly products for decades. Thanks to digitally dimmable ballasts and effective light management, for example, it is possible to achieve energy savings of up to 80 % versus conventional lighting technology, thus reducing CO₂ emissions enormously. Additionally it is providing greater ease of use and economic viability.

3 TALEX LED: **CO₂, more innovation**

The Kyoto Protocol, which was concluded in 1997 and took effect in 2005, sets binding threshold values for greenhouse gas emissions. In addition to this Protocol, the EU has also agreed to reduce its emissions by 20 % by the year 2020. LED modules from TridonicAtco are already helping to make enormous energy savings possible today. Over the past five years, for example, approx. 1,200 LED chains with a connected load of about 5 MW have been produced. This represents a reduction in CO₂ emissions of nearly 60,000 tonnes in comparison with equivalent neon systems.

5 Research and Development: **no hazardous material, no disposal of waste**

Environmental protection starts with the production of operating devices. Not only did TridonicAtco convert all of its manufacturing processes to the use of environmentally friendly materials back in summer 2005, but it also made its entire product range available without lead before the 2002/95/EC (RoHS) Directive came into force. TridonicAtco has been just as zealous in its pursuit of modern solutions for batteries; the results include rechargeable nickel-metal hydride batteries (NiMH) which are free of all hazardous materials.

7 Close to the market: **less haulage distance, less pollution**

Today, it is impossible for a company to develop successfully unless it thinks globally. Even so, 16 % of global energy consumption and 46 % of all oil consumption is consumed by the transportation sector alone. TridonicAtco unites a global presence with well-founded knowledge of local markets. Thanks to our production locations in Europe, Asia and Australia, we are able to make deliveries to our local customers quickly, and, in accordance with „think globally – act locally“, the company has also created a network of 52 locations around the globe.

2 Road Lighting: **minimum cost, maximum economic efficiency**

30 % of the street lights in Europe are more than 20 years old, producing more than four million tonnes of CO₂ every year. One of the most interesting means of reducing the energy consumption of old lighting systems is to replace high-pressure mercury lamps with high-pressure sodium lamps. TridonicAtco has customised solutions for this, which make it possible to reduce conversion costs to a fraction of what might otherwise be incurred.

4 Electronic Control Gear: **longer lamp life, less maintenance, less waste**

The cost-effectiveness of products represents an important factor in the conservation of resources. Nearly all products from TridonicAtco have been designed with the objective of extending the service life of lamps. PC Industry, for example, a ballast for industrial use, is able to achieve a service life of over 100,000 hours even at ambient temperatures of 60 °C.

6 Trigger for Innovation: **optimum design, maximum energy saving**

While the Energy-using Products Directive (2005/32/EC) and its objective of saving energy and other resources in the production, operation and disposal of the products covered has come into force, to date only Austria and Great Britain have adopted this directive into their national law. Although this directive does not impose any legal requirements, TridonicAtco has not been waiting. It has already been developing products and ideas to reduce energy consumption and increase the efficiency of energy use for years.

8 Quality and Environment: **better processes, tight control**

Our environment requires far more than scattered protective measures today – modern environmental management is called for. At TridonicAtco, environmental management (ISO 14001) constitutes an integral part of our quality management system (ISO 9001). This means that procedures, processes and responsibilities are carefully defined for all environmentally relevant processes and activities in order to ensure compliance. Both of these standards represent top quality and maximum benefit for the environment.

Maintaining a comprehensive view: ecolution

For an innovative company such as TridonicAtco, paying constant attention to processes and process chains with regard to their environmental compatibility is an important driver for the creation of new products and processes. It is also characteristic of the company's fundamental attitude. TridonicAtco has given this driver a name and a motto: ecolution.



There is a new name for success with LED – TALEX.

www.tridonicatco.com




TALEXengine

With TALEXengine TridonicAtco sets another milestone in modern lighting technology – a complete system that builds the basis for a wide range of intelligent value-added lighting solutions. All the benefits of modern LED technology are built into this sophisticated but simple to use product: slim design, long life, true white light quality and not least the choice of application-specific colours. TALEXengine: More than just LED.

a world of bright ideas®

TRIDONIC.ATCO



TALEXengine – SLIM DESIGN AND FLEXIBLE LENGTHS FOR PRESENTING THE MERCHANDISE IN THE BEST LIGHT.



LED MODULES FOR SUSTAINABILITY



Everyone is talking now about ways in which CO₂ emissions can be reduced to help keep our planet a healthy place for future generations. Energy-efficient lighting is an excellent way of achieving relatively large potential energy savings because 20 % of the electrical power consumed throughout the world goes on artificial lighting.

TridonicAtco has had increasing success in this area over the years with a wide variety of products including its **TALEX** brand LED modules. In the signage sector these innovative modules have saved the CO₂ equivalent of 15,000 flights from Frankfurt to New York and back in just the past five years. LED modules have now become well established in signage elements because they offer many advantages over the alternatives – neon tubes or backlighting with fluorescent lamps. **TALEX** modules with chip-on-board (COB) technology from TridonicAtco are easy to assemble and easy to install. They have high luminous efficacy, excellent colour saturation and a low mounting depth to ensure uniform illumination of lettering and logos. Brand names and company names are given the prominence they deserve.

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 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
- 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.

Anti-Corruption 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.

ATTACHMENT D

Code of
Conduct

ATTACHMENT D

TABLE OF CONTENTS

1	Introduction	5
2	General principles	7
2.1	Scope and application	7
2.2	Responsibility of all Zumtobel Group employees	7
3	Communications	9
3.1	Basic principles	9
3.2	Communications with customers	9
3.3	Communications with suppliers	10
3.4	Communications with the authorities	10
3.5	Communications with the media	11
3.6	Communications with competitors	11
3.7	Communications within the Zumtobel Group	11
4	Corruption	13
4.1	Basic principles	13
4.2	Bribery	13
4.3	Facilitation payments	14
4.4	Gifts, hospitality, establishing business relationships	14
4.5	Charity donations	15
4.6	Sponsorship	15
4.7	Political donations	16
4.8	Money laundering	16
4.9	Relations with the authorities	17
5	Confidentiality and protection of corporate property	19
5.1	Basic principles	19
5.2	Classification of corporate information	19
5.3	Insider information	20
5.4	Corporate property	20
5.5	E-mail, intranet and Internet	21
6	Social responsibility and environmental protection	23
6.1	Basic principles	23
6.2	Working conditions	23
6.3	Misuse of alcohol and drugs	23
6.4	Sexual harassment	24
6.5	Discrimination	24
6.6	Environment, health and safety	25
7	Rules of competition	27
7.1	Basic principles	27
7.2	Unfair competition	27
7.3	Behaviour towards customers	28
7.4	Behaviour towards suppliers	29
7.5	Behaviour towards competitors	29
8	Protection of intellectual property	31
9	Conflict of interests	33
10	Compliance with the Code of Conduct	35
10.1	Basic principles	35
10.2	Ethics Officer	35
11	Reporting breaches of conduct	36
12	Glossary	39

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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.