

16th February 2011

Secretary-General
United Nations
New York, NY 10017
USA

Dear Mr.Georg Kell
Executive Director

Further to our letter of 17th December 2009, I am pleased to confirm that Tridonic New Zealand limited (formerly 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 16th February 2011, general information relating to our company and products of which are available against <http://www.tridonic.com>. Of interest and in addition to the attached COP content we are in the initial stages of establishing our Group Sustainability Report. This will collect our “Environmental data” to be benchmarked against peers and monitored for continuous environmental improvement. Further detail will be included with our next Global Compact Communications on Progress.

Sincerely yours,



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



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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.

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.

Tridonic 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 Global Operations and Tridonic NZ for the period *May 2010 to Jan 2011*. By preventative and corrective actions throughout the year, Tridonic NZ is targeting to reduce the number of injury rates for the upcoming year.

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

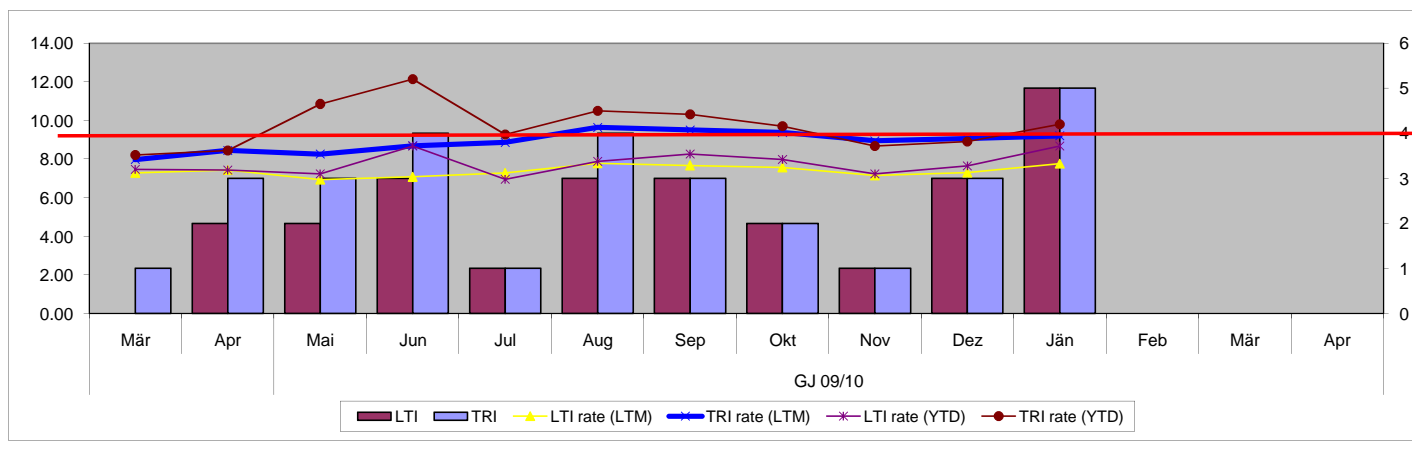
| | 05/2008 to 04/2009 (12 months) | 05/2009 to 04/2010 (12 months) | 05/2010 to 01/2011 (9 months) |
|--------------------------------------|---|---|--|
| LTI (Lost Time Injury) | 2 | 2 | 1 |
| TRI (Total Recordable Injury) | 3 | 2 | 3 |
| Total working hours | 62236 | 58369 | 91924 |

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 each year for their safer & healthier staffs:

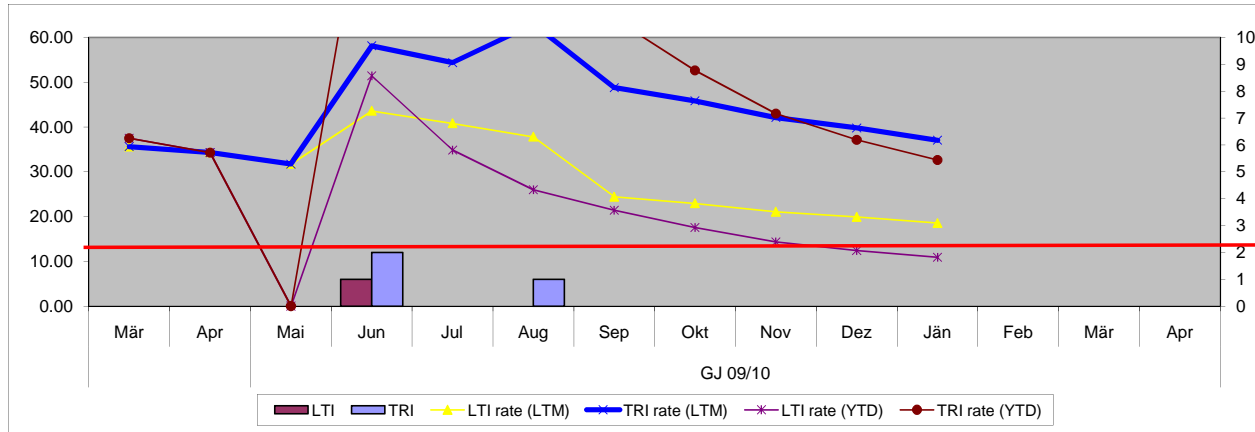
- Influenza Vaccination at the beginning of winter each year.
- Hearing Test for all employees from New Zealand certified organization
- Safe Material Handling Procedure training session by ACC (Accident Compensation Corporation, NZ) approved Trainer to avoid back injury at work place.
- Fire Extinguisher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

ATTACHMENT A.1



| | GJ 09/10 | | | | | | GJ 09/10 | | | | | | Feb | Mär | Apr |
|-----------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|--|-----|-----|-----|
| | Mär | Apr | Mai | Jun | Jul | Aug | Sep | Okt | Nov | Dez | Jän | | | | |
| LTI | 0 | 2 | 2 | 3 | 1 | 3 | 3 | 2 | 1 | 3 | 5 | | | | |
| TRI | 1 | 3 | 3 | 4 | 1 | 4 | 3 | 2 | 1 | 3 | 5 | | | | |
| hours | 291,937 | 280,262 | 276,478 | 300,515 | 286,089 | 279,916 | 311,215 | 299,703 | 322,453 | 280,718 | 297,366 | | | | |
| LTI rate (month) | 0.0 | 7.1 | 7.2 | 10.0 | 3.5 | 10.7 | 9.6 | 6.7 | 3.1 | 10.7 | 16.8 | | | | |
| TRI rate (month) | 3.4 | 10.7 | 10.9 | 13.3 | 3.5 | 14.3 | 9.6 | 6.7 | 3.1 | 10.7 | 16.8 | | | | |
| LTI rate (LTM) | 7.28 | 7.43 | 6.93 | 7.07 | 7.27 | 7.77 | 7.67 | 7.56 | 7.15 | 7.30 | 7.76 | | | | |
| TRI rate (LTM) | 7.97 | 8.45 | 8.26 | 8.68 | 8.85 | 9.64 | 9.51 | 9.37 | 8.94 | 9.05 | 9.20 | | | | |
| LTI rate (YTD) | 7.46 | 7.43 | 7.23 | 8.67 | 6.95 | 7.87 | 8.25 | 7.98 | 7.22 | 7.64 | 8.66 | | | | |
| TRI rate (YTD) | 8.21 | 8.45 | 10.85 | 12.13 | 9.27 | 10.50 | 10.31 | 9.69 | 8.67 | 8.91 | 9.79 | | | | |

ATTACHMENT A.2



| | GJ 09/10 | | GJ 09/10 | | | | | | | | | | | |
|-----------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-----|-----|-----|
| | Mär | Apr | Mai | Jun | Jul | Aug | Sep | Okt | Nov | Dez | Jän | Feb | Mär | Apr |
| LTI | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| TRI | 0 | 0 | 0 | 2 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | | | |
| hours | 6,798 | 4,975 | 8,850 | 10,607 | 9,237 | 9,842 | 8,260 | 10,258 | 12,759 | 10,997 | 11,114 | | | |
| LTI rate (month) | 0.0 | 0.0 | 0.0 | 94.3 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | |
| TRI rate (month) | 0.0 | 0.0 | 0.0 | 188.6 | 0.0 | 101.6 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | | | |
| LTI rate (LTM) | 35.60 | 34.26 | 31.71 | 43.57 | 40.76 | 37.77 | 24.39 | 22.91 | 21.04 | 19.89 | 18.51 | | | |
| TRI rate (LTM) | 35.60 | 34.26 | 31.71 | 58.09 | 54.35 | 62.95 | 48.78 | 45.81 | 42.09 | 39.78 | 37.02 | | | |
| LTI rate (YTD) | 37.46 | 34.26 | 0.00 | 51.40 | 34.85 | 25.95 | 21.37 | 17.53 | 14.32 | 12.37 | 10.88 | | | |
| TRI rate (YTD) | 37.46 | 34.26 | 0.00 | 102.79 | 69.70 | 77.85 | 64.11 | 52.58 | 42.97 | 37.12 | 32.64 | | | |

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.

- Child Labor

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. 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 | No of Employees - 2009/10 | No of Employees - 2010/11 |
|------------|----------------------------------|----------------------------------|
| 18 -20 | 4 | 2 |
| 21-30 | 15 | 23 |
| 31-40 | 11 | 9 |
| 41-50 | 11 | 11 |
| 51-60 | 10 | 12 |
| Above 60 | 0 | 2 |

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.

ATTACHMENT B

Code of Conduct



ATTACHMENT B

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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.

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

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 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.

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

ATTACHMENT C.2

TRIDONIC

▼ enlightening your ideas



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.

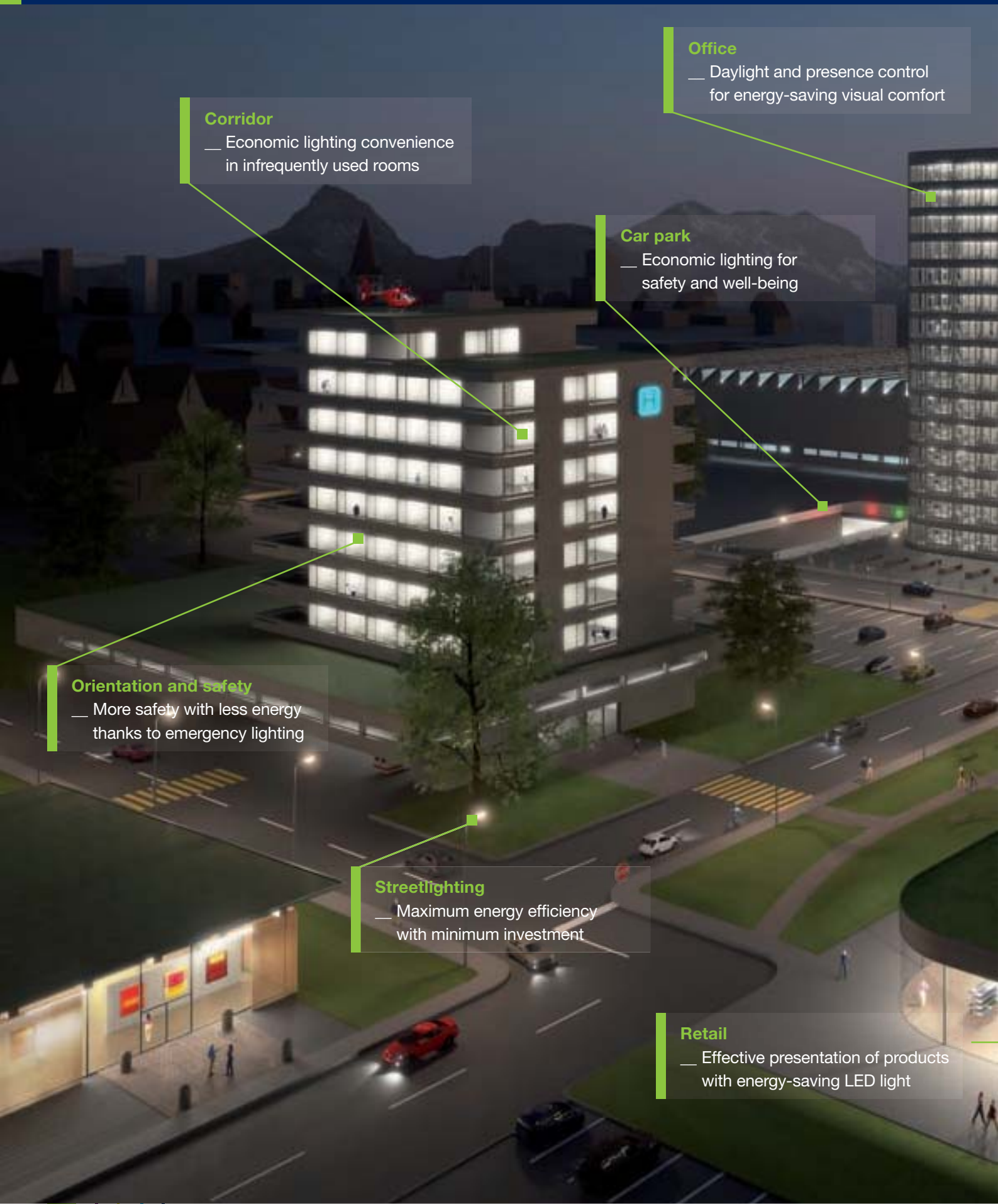
Company

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

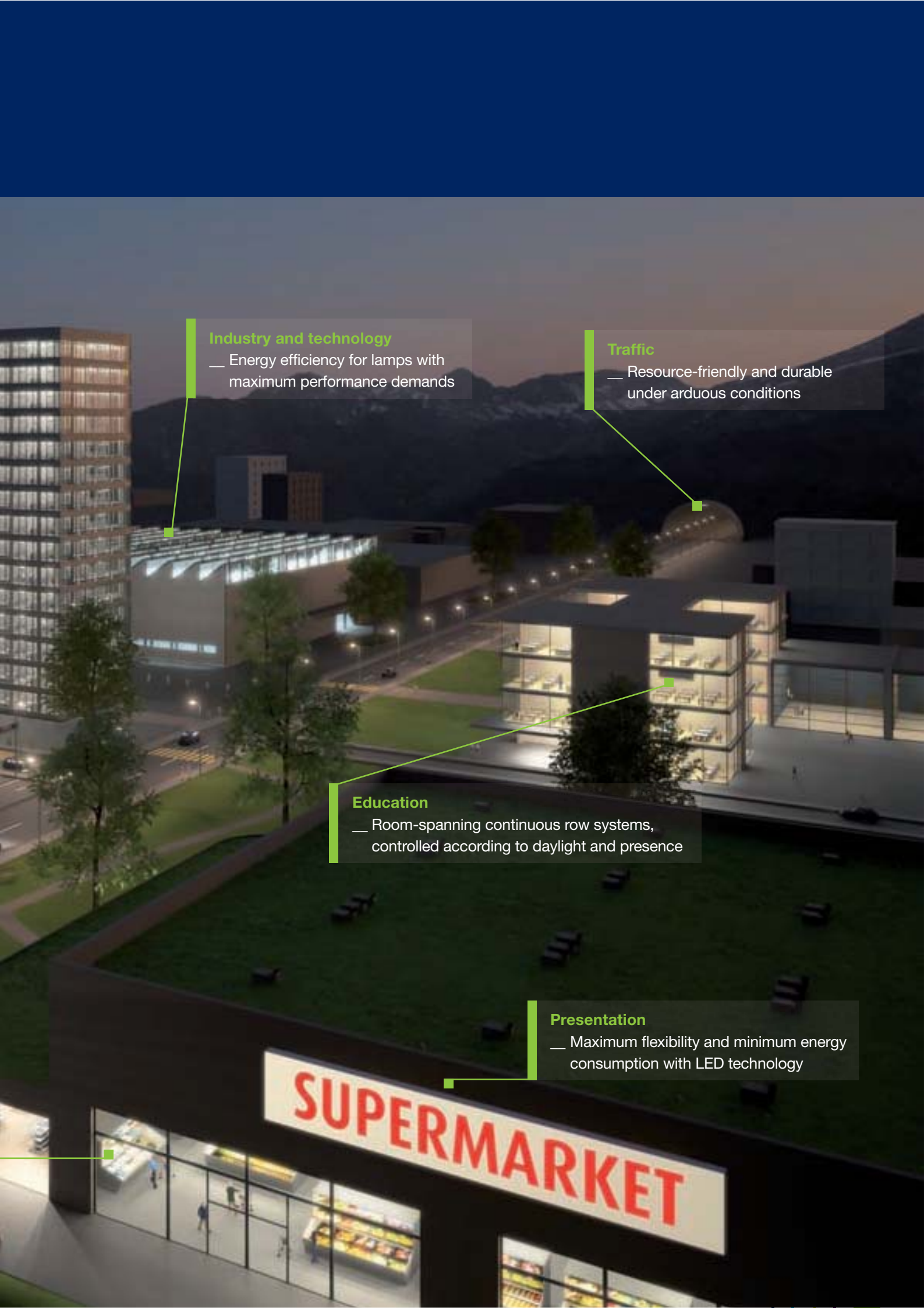
— More safety with less energy thanks to emergency lighting

Streetlighting

— Maximum energy efficiency with minimum investment

Retail

— Effective presentation of products with energy-saving LED light

An architectural rendering of a modern building complex at dusk. The scene features a tall office building on the left, a large glass-walled structure in the middle, and a supermarket in the foreground. A green line connects the callout boxes to specific parts of the building. The background shows mountains under a dark sky.

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

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.

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

Tridonic NZ is part of a 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

Objective:

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.).

ATTACHMENT D

Code of Conduct



zumtobel group

ATTACHMENT D

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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.