Information Dornbirn, 24 September 2020

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Zumtobel Sustainable Procurement Program

The Zumtobel Group's Sustainable Procurement Initiative aims to communicate the company's expectations in the area of corporate social and environmental responsibility to existing as well as to potential business partners. The intention is to provide transparency to all stakeholders in terms of the relevant procurement processes, contents and procedures.

For the Zumtobel Group, integrating sustainability into its procurement activities means working even more closely with business partners all around the world in order to ensure sustainable business processes. In turn, the Zumtobel Group expects all stakeholders to demonstrate their own commitment towards social and environmental responsibility.

Zumtobel Group's procurement activities focus on the greater protection of employees and the environment, as well as the responsible use of resources and the reduction of the joint long-term environmental impact. Therefore it is of utmost importance to also integrate sustainability into supplier management tools to optimise the potential of the entire value chain.

The requirements of the initiative are deeply embedded into the group-wide procurement process. This ensures that our requirements regarding sustainability are met by all of our business partners.

Our efforts to achieve sustainable procurement

The initial requirements for all of our business partners are stated in the Business Partner Code of Conduct for corporate social and environmental responsibility. Compliance to the Code of Conduct is a pre-condition in the selection of new business partners, without exception. If initial discussions with potential business partners indicate a potential risk regarding corporate social and environmental responsibility which is confirmed during an on-site inspection, this will lead to an intensive plan of improvements and actions, or to the termination of the partnership if the outcome remains negative.

Business partner compliance with the Zumtobel Group's requirements for corporate social and environmental responsibility is monitored through the following processes:

New Suppliers

Business Partner Social and Environmental Conformance Process

- 1) Self-assessment questionnaire, Code of Conduct confirmation
- 2) Submission of REACH, RoHs, conflict materials declaration
- 3) Supplier Sustainability Audit
- 4) Follow up process to ensure improvements implemented following any non-conformance

Existing Suppliers

Continued Conformance managed by:

- Regular supplier assessment
- Supplier development according to need
- Rolling programme of Sustainability Audits to ensure continued compliance
- Integrating sustainability as a fundamental part of Purchasing Commodity Strategies

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This Business Partner Social and Environmental Conformance Process is integrated into the approval process for potential new business partners (GSAP). The procedures include a Self-Assessment Questionnaire and a Sustainability Audit that should both identify the current status, any potential risks and the scope for improvement.

Supplier Sustainability Self-Assessment Questionnaire

This questionnaire requires business partners to provide general information in the categories of Labour, Health & Safety, Environment and Ethics. Based on this, a first conformity check regarding the sustainability requirements of the Zumtobel Group is provided. Indications of non-conformities with the minimum requirements outlined in the Business Partner Code of Conduct can lead to the termination of the enquiry.

Supplier Sustainability Audit

The Sustainability Audit serves as a further instrument to monitor compliance of business partners with the Zumtobel Group's expectations towards corporate social and environmental responsibility. The audit will be conducted at the site of the business partner to evaluate their level of compliance. Moreover, the Sustainability Audit enables identification of any non-conformities, together with the implementation of corrective actions. Implementation and subsequent effectiveness of these actions will be checked via a follow-up process. If the non-conformities to the minimum requirements are not improved to the required standard within a defined timeframe, the termination of the potential business partnership will be enforced.

Please find more details on the sustainability commitments of the Zumtobel Group within the sustainability section of our website: <u>https://z.lighting/en/group/sustainability/</u>

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Sustainability Questionnaire

1	General Information
1.1	Company Name
1.2	Company contact person for Sustainability
1.3	Email address of contact person
1.4	Country of facility
1.5	Number of employees/workers
1.6	Does your company have a program in place to manage adherence with your own and/or customers' sustainability requirements?
1.7	Has your company undergone sustainability audits during recent years?
1.8	Which companies have conducted these sustainability audits?
1.9	When were these audits performed?
1.10	Does your company publish a sustainability/CSR report?

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2	Labour
2.1	Does your company have a written policy for ensuring labour laws and regulations are complied with throughout all of your facilities?
2.2	Does this policy apply to all of your facilities?
2.3	Is a management representative responsible for ensuring labour laws and regulations are complied with throughout all of your facilities?
2.4	Are your company's labour policy and related guidelines formally reviewed by the Management Team?
2.5	If yes, when was the last review?
2.6	Does your company's labour policy and related guidelines contain a commitment to continuous improvement?
2.7	If yes: How do you measure this? What are the metrics / targets?
2.8	Are all communications relating to labour policies and guidelines expressed in the local / appropriate language?
2.9	Does your company have a guideline that regulates the minimum age of employment according to the minimum requirements by legislation?
2.10	Do you have rules that govern the maximum number of consecutive working days for your employees?
2.11	If yes: Please state the maximum number of consecutive working days.
2.12	Do you keep records of your employees' working hours (including overtime) and wage payments in order to ensure compliance with ILO (International Labor Organization) standards and local legislation?
2.13	Is there a check or verification of age during the hiring process of new employees?
2.14	If yes: How do you check the age of your employees?
2.15	Do you possess currently valid SA8000 certification?
2.16	If yes: When was it obtained? Please send a copy.
2.17	If no: Do you have concrete plans to achieve this certification? If so, by when?
2.18	Briefly describe any other initiatives you are undertaking to improve sustainability performance in the area of labour.

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3	Health & Safety
3.1	Does your company have a written Health and Safety Policy?
3.2	Does this Health and Safety Policy apply to all of your facilities?
3.3	Is a management representative responsible for ensuring Health and Safety laws and regulations are complied with throughout all of your facilities?
3.4	Are your company's Health and Safety policy and related guidelines formally reviewed by the Management Team?
3.5	If yes, when was the last review?
3.6	Does your company's Health and Safety policy and related guidelines contain a commitment to continuous improvement?
3.7	If yes: How do you measure this? What are the metrics/targets?
3.8	Are all Health and Safety policies and guidelines expressed in the local / appropriate language?
3.9	Does your company enforce the use of personal protective equipment? (e.g. safety goggles, safety shoes, ear protection, protective gloves, etc.)
3.10	Are all employees trained on relevant health and safety matters?
3.11	 Please select all fields that apply. Emergency Management Machine safeguarding Hazardous materials handling Occupational health and safety Personal protection euipment
3.12	Does your company conduct facility level Safety Audits on a routine basis with a process to track and close corrective action plans?
3.13	Does the facility have a written emergency response plan and fire evacuation procedure?
3.14	Are records tracked regarding work related injuries and illness?
3.15	Are there formal and measureable performance objectives?
3.16	Do you possess currently valid OHSAS 18001 or ISO 45001 certification?
3.17	If yes: When was it obtained? Please send a copy.
3.18	If no: Do you have concrete plans to achieve this certification? If so, by when?
3.19	Briefly describe any other initiatives you are undertaking to improve sustainability performance in the area of health and safety.

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4	Environment
4.1	Does your company have a written Environmental Policy?
4.2	Does this Environmental Policy apply to all of your facilities?
4.3	Is a management representative responsible for ensuring Environmental laws and regulations are complied with throughout all of your facilities?
4.4	Are your company's Environmental policy and related guidelines formally reviewed by the Management Team?
4.5	If yes, when was the last review?
4.6	Does your company's Environmental policy and related guidelines contain a commitment to continuous improvement?
4.7	If yes: How do you measure this? What are the metrics/targets?
4.8	Are all Environmental policies and guidelines expressed in the local / appropriate language?
4.9	Does the facility monitor and track energy consumption?
4.10	Does the facility have a program and/or procedures to reduce the use of energy?
4.11	Does the facility have goals and targets to reduce greenhouse gas (GHG) emissions?
4.12	Does your facility have work procedures to manage the use of restricted substances and chemicals?
4.13	Does the facility keep track of all chemical substances used, stored, processed, and manufactured?
4.14	Has your company/facility conducted on-site energy audits in the last 3 years?
4.15	Do you possess currently valid ISO 14001 or ISO50001 certification?
4.16	If yes: When was it obtained? Please send a copy.
4.17	If no: Do you have concrete plans to achieve this certification? If so, by when?
4.18	Briefly describe any other initiatives you are undertaking to improve sustainability performance in the area of the environment.

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5	Ethics
5.1	Does your company have its own Code of Conduct/Ethics policy, and is this rolled out throughout all of your facilities?
5.2	If Yes: Does your company's Code of Conduct include a policy for corruption, extortion, bribery and conflict materials?
5.3	Is a management representative responsible for ensuring business ethics and laws are complied with throughout all of your facilities?
5.4	Are your company's ethics Code of Conduct/Ethics policy and related guidelines formally reviewed by the Management Team?
5.5	If yes, when was the last review?
5.6	Does your company's Code of Conduct/Ethics policy and related guidelines contain a commitment to continuous improvement?
5.7	If yes: How do you measure this? What are the metrics/targets?
5.8	Are all communications relating to ethics policies and guidelines expressed in the local / appropriate language?
5.9	Has your company been involved in legal proceedings regarding corruption, bribery, or antitrust during the past 5 years?
5.10	Does your company have a program or process to protect intellectual property such as confidential information, parts and data?
5.11	Do you expect your own suppliers to adopt your company's position on ethical behaviour?
5.12	If yes: How do you ensure this?
5.13	Briefly describe any other initiatives you are undertaking to improve sustainability performance in the area of the ethics.

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