

CODE OF CONDUCT

2023

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TRIDONIC

 ZUMTOBEL

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FOREWORD



Dear Colleagues.

For over 70 years now, our ambition has been to create innovative and needs-based lighting solutions, components and services for our customers.

Our success in doing this has been founded largely on the combined expertise of our employees¹, our innovative strength and the great long-term collaborations that we have established with our partners worldwide. Continuity and compliance with legal and ethical standards are important components of these sustainable and trusting partnerships.

We have documented our social contribution and our belief that we represent sustainable and responsible corporate governance by voluntarily joining the UN Global Compact Initiative. This is both a motivation and a challenge for us.

The principles outlined in this Code of Conduct are a guide and are intended to help you as employees and as part of the Zumtobel Group to act with integrity in every business situation and specifically to minimise risks for the company².

Each one of us is personally responsible for ensuring that our actions comply with these rules of conduct and that breaches are not tolerated in silence.

The following principles of conduct should guide us in our dealings with colleagues, customers, suppliers, business partners, shareholders and public authorities. They also serve primarily to protect you as well as our company and all other stakeholders.

We also expect our business partners to comply with the principles of this Code of Conduct in their dealings with their own employees and business partners as well as, in particular, when dealing with employees of our company.

In the event of any confusion about individual rules, your supervisor should be your first point of contact. You are also welcome to contact the Corporate Compliance Coordinator at any time.

Thank you very much for your support in implementing the principles of conduct outlined below.

Best regards,
Alfred Felder
CEO Zumtobel Group AG

¹ Any use of the male pronoun in this document will also apply equally to the female gender.

² To make it easier to navigate around the text, we have added colour-coding in the margin (**black** = principle/company perspective, **green** = expectations placed on employees/managers/suppliers, etc., **blue** = assistance (responsible department)).

OUR RESPONSIBILITY



Alfred Felder
CEO Zumtobel Group



Thomas Erath
CFO Zumtobel Group



Bernhard Motzko
COO Zumtobel Group



Marcus Frantz
CDTO Zumtobel Group



Hugo Rohner
CEO Tridonic



Alexander Stieger
CFO Tridonic



Alexander Jankovsky
COO Tridonic



Petra Steiner
SVP Global HR



Ovidiu-Radu Petreaca
Chief Sales Officer Lighting



Christoph Zimmermann
SVP Global Sales Tridonic



Miroslav Ardan
SVP Global Purchasing
Zumtobel Group



Stephan Hempel
Senior Director
Corp. Audit & Compliance

General principles of conduct

- We respect human rights and condemn all forms of discrimination.
- Our behaviour is marked by respect, honesty, transparency and reliability.
- We comply with applicable laws and internal guidelines.
- We do not tolerate any form of corruption and will report corrupt behaviour by third parties.
- We always act in the best interests of the company.
- We respect all property.
- We are committed to fair competition.
- We are committed to sustainability and environmental protection



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01 BASIC REQUIREMENTS

Individual responsibility

The standards of conduct described in this Code are an obligation for all employees, but are also intended to protect them at the same time. For further details and for answers to specific questions, the internal company regulations mentioned in the text and the named departments should be consulted.

All employees are asked to review their own conduct on the basis of the rules listed here and to ensure that they comply with them.

Employees are asked to report breaches and justified suspicions promptly. As a general rule, the supervisor should be the first point of contact.

Leadership and the conduct of supervisors

Managers should set an example in implementing the standards of conduct. They are particularly encouraged to actively demonstrate integrity in their daily business activities and to inform the employees in their own area of responsibility about the principles specified in this Code of Conduct.

Managers are also obliged to ensure compliance with the Code of Conduct in their particular area of responsibility and to impose appropriate sanctions and corrective actions for any misconduct, determined on a case-by-case basis. Part of this responsibility is the establishment of suitable control and monitoring routines for the main risk areas specified in this document.

The supervisor will be supported in this task by the company departments indicated in the respective sections. Further assistance can be found in the leaflets compiled for each section of the Code, in which the relevant policies have been listed and the key points summarised again for internal use.

Four questions as a quick test of integrity

It is impossible to set rules in advance to cover every situation that may arise in day-to-day business. However, this Code of Conduct, supplemented by internal company regulations, is still an effective practical guide.

The following questions may help with making decisions and act as a bridge to existing regulations:

1. Does it seem right and ethically justifiable to me to act in this way? What is my gut feeling telling me?
2. Do my actions comply with laws and internal company regulations?
3. If my actions were made known publicly, even if unintentionally, would they be understandable and justifiable from the company's point of view?
4. Can damage to the Zumtobel Group's reputation be precluded?

In instances where any one of the above questions CANNOT be answered with a resounding YES, employees are called upon to consult the specified contact person in the department before acting, depending on the situation.

Conduct in conflict situations: contact persons

If employees are uncertain about the legal implications of their own conduct or if there is any indication of legally dubious practices in their working environment, they should contact their supervisors in the first instance. They can also seek specialist advice from the Legal department or HR department (for employment law issues).

If employees have good reason to believe that this process is not appropriate in a particular case, they can also contact the Zumtobel Group's Corporate Compliance Coordinator or the Head of Internal Audit directly, in the strictest confidence, via compliance@zumtobelgroup.com. Another option is to report potential irregularities confidentially and anonymously using the Zumtobel Group's whistleblower system, which can be accessed via our company website.

No employee will be penalised for expressing their concerns or reporting specific violations in good faith.

[Information about the Zumtobel Group's whistleblower system](#)

Department: Corporate Compliance

Legal compliance as a basis

Observing the laws and complying with the legal system in the country in which our employees are working are fundamental principles of the Zumtobel Group.

With the assistance of internal company regulations and training, we endeavor to avoid violations of the law in particularly critical areas under all circumstances. All employees must therefore observe the applicable company guidelines and the statutory provisions of the legal system by which they are bound.

Serious violations by employees may – independent of any additional legal sanctions – result in disciplinary action due to a breach of contractual obligations. When assessing the severity of the violation, factors such as intent and gross negligence, but also the level of training, will be taken into consideration.

We also expect our business partners to comply with all applicable legal and ethical frameworks. If we are made aware of violations of statutory provisions or breaches of ethical standards by business partners or their employees, this could result in the termination of the business relationship. We also reserve the right to assert claims for compensation and to take other legal action.

Respect and fairness as the foundations of our system of values

The Zumtobel Group adheres to basic rules of conduct and compliance with human rights to ensure that no employee or business partner is treated unfairly or disrespectfully. The Zumtobel Group supports and respects international human rights, in accordance with the principles of the International Labor Organization (ILO).

Compliance with due diligence principles

In order to meet these requirements, care is taken to ensure that the Zumtobel Group is not complicit in human rights violations. The Zumtobel Group and its business partners ensure that continuous risk analyses are carried out to ensure compliance with due diligence obligations. The following conventions are relevant for this purpose:

Discrimination and fair working conditions

In accordance with the Zumtobel Group's Corporate Policies and the laws and other regulations of the countries in which Zumtobel operates, we do not tolerate discrimination based on ethical origin, culture, religion, age, disability, skin color, sexual orientation, ideology and gender, nor do we tolerate sexual harassment or other personal attacks on individuals. The Zumtobel Group is committed to compliance, equal pay for male, female and diverse workers for work of equal value. Decisions are made exclusively on the basis of business-relevant criteria such as suitability, performance and competence.

Child labor

The Zumtobel Group does not tolerate any form of child labour. In particular, the regulations on the minimum age for admission to employment, the prohibition as well as immediate measures to eliminate child labour, the Zumtobel Group is expressly committed to this.

Forced labor

The Zumtobel Group opposes any form of forced and slavery labor. Zumtobel requires its business partners to observe and comply with these principles in the same way.

Freedom of association and right to collective bargaining

The Zumtobel Group respects employees' freedom of association and the right to collective bargaining in accordance with applicable laws and ILO conventions.

Occupational safety and health

The health and integrity of employees is the Zumtobel Group's highest priority. As an employer, the Zumtobel Group strives to provide its employees with a safe and healthy working environment and does not tolerate drug or alcohol abuse. Zumtobel Group employees are prohibited from possessing, selling or consuming drugs in the course of their employment.³ The Zumtobel Group takes all measures required by law to ensure that its employees do not pose a risk to the public in the performance of their duties.

The protection of employees in the workplace and the protection of the health of employees (e.g. external service providers) are ensured within the framework of national regulations and the process of improving working conditions is continuously driven forward.

Supervisors and employees are encouraged to familiarize themselves with and monitor compliance with the extensive set of internal company regulations and local laws compiled on the intranet.

Core regulations:

- Handling hazardous substances and environmental protection
- Workplace instructions
- Emergency plans
- Accident prevention
- First aid

Observed misconduct, accidents and illness must be reported promptly to your supervisor.

Department: Site Health and Safety

³ Of course, this does not apply to medication prescribed by a doctor.

Sustainability and environment

Sustainability is an essential and important topic for the Zumtobel Group. To this end, the Zumtobel Group has documented its sustainability performance in accordance with the globally applicable GRI 2021 reporting standard and published it in a sustainability report, thereby ensuring comprehensive transparency for all business partners.

Environmental protection forms an essential part of the integrated management system.

The Zumtobel Group's environmental management concept is based on three pillars: Certified environmental management and energy management systems in accordance with the international standards ISO 14001 and ISO 50001, consistent compliance with internal and external obligations and guidelines on environmental protection, and the pursuit of continuous improvement in the company's environmental and energy-related performance.

The main objectives of the integrated management system are to improve environmental performance, to meet environmental targets for reducing and avoiding environmental impact, and to comply with legal, regulatory and voluntary obligations. These include the conventions to reduce environmental impacts to be considered in due diligence.

- Minamata Convention
- Stockholm Convention
- Basel Convention

The Zumtobel Group's environmental policy sets out principles and objectives for environmental protection.

The Zumtobel Group aims to demonstrate its efforts in sustainability performance not only in its own business activities, but also to consider, expand and further develop its commitment to the environment and sustainability along the entire value chain and to include its business partners and their employees* in its ecological responsibility.

02 DEALING WITH BUSINESS PARTNERS AND THIRD PARTIES

Anti-corruption, gifts and entertainment

The Zumtobel Group strives to gain and secure competitive advantages over other market players. We achieve these advantages through the continuous improvement of our products and services. We strictly reject any form of prohibited agreement and corruption.

Employees of the Zumtobel Group are strictly forbidden to secure an unfair advantage, gain new business or continue existing business with third parties

- by offering or promising
- something of value
- either directly or indirectly

This includes, for example, the acceptance of cash or comparable benefits in kind (jewellery/precious metals).

Particular restraint in this regard should be applied in the case of civil servants and other public officials, even for low-value gifts.

Employees of the Zumtobel Group must not solicit, accept or promise to accept such benefits from business partners.

In a few countries, refusing a gift from a business partner is interpreted as a gross discourtesy. In particular circumstances,

such a refusal can even jeopardise the business relationship. If such situation arises, employees are advised to contact the Corporate Compliance Coordinator immediately.

The policy defines the scope within which the acceptance of invitations and small gifts is permitted in order to consolidate normal business relationships. The same applies to the giving of invitations and small courtesy gifts to business contacts.

The nomination of business partners (e.g. agents) who act on behalf of the Zumtobel Group is subject to strict prior checks (e.g. checking of previous business conduct). When concluding a contract, we require the contractor to provide us with explicit written confirmation that it acts lawfully in this area.

| Department: Corporate Compliance

Donations and sponsorship

The Zumtobel Group welcomes the involvement of its employees in associations or even political activities outside of work. Such involvement must, however, take place in their free time and at their own cost. The Zumtobel Group does not give any donations or make other payments to political parties, political organisations or their representatives.

Donations to charities or sponsorships are permitted within the framework of the applicable company guidelines. Care must be taken when making sponsorship payments that the money will not exert any direct influence on future decisions made by the recipient (e.g. the placement of orders) and that all sponsorship benefits are transparent and fully documented (e.g. intrinsic value of the benefit in return).

Departments: Group Communications and Global Marketing

Anti-money laundering

Money laundering is carried out by people or organisations involved in criminal activities, such as terrorism, drug trafficking, bribery or extortion, and who or which attempt to smuggle money gained from these activities into normal financial and economic circulation to make it look like legitimate revenue and to disguise the actual origin of the money or the identity of the owner.

The Zumtobel Group and its employees are obliged to comply strictly with all laws to prevent money laundering. For this reason, we only enter into business relationships with reputable customers and business partners.

All divisions of the Zumtobel Group must ensure that no cash flows are accepted that could be connected with criminal activities. In case of doubt, a careful examination must be carried out of all the parties involved in a business transaction. The same applies to unexpected incoming payments that cannot be assigned directly to a particular business transaction. Cash sales are forbidden within the Zumtobel Group, except in a few exceptions that require approval.

If there is any suspicion or indication that a business partner is involved in money laundering or other illegal activities, the Corporate Compliance Coordinator must be contacted immediately.

Departments: Corporate Accounting, Treasury and Corporate Compliance

Export control

As a company that operates globally, the Zumtobel Group is regularly involved in cross-border transactions.

Prior to completing a business transaction, our employees are obliged to ensure that

- the final consignee and the country of delivery are known to us and
- the end use of the delivered products is known to us.

These details are checked against embargo/sanction lists in a largely automated and centralised process.

Relevant checking routines (ad hoc and regular) are described in detail in work instructions issued by the Customs and Export Control department. These also describe how to fill out the shipping documents for customs fully and correctly.

Department: Global Customs and Export Control

Business relationships with suppliers

We require our suppliers to share our system of values. Our Business Partner Code of Conduct specifies the expectations we have of our suppliers and their supply chains. These are the values that we in the Zumtobel Group expect to be upheld as a matter of course:

- compliance with all applicable laws,
- rejection of corruption,
- respect for the human rights of employees,
- rejection of any form of forced and child labor, and compliance with the relevant laws,
- responsibility for the health and safety of employees,
- compliance with environmental laws and standards.
- uphold the freedom of association and the right to collective bargaining,
- to stand up against all forms of corruption, extortion and bribery.

These rules of conduct will be issued to and discussed with every potential new supplier. A business relationship with the Zumtobel Group will only be established once the content of the Business Partner Code of Conduct has been accepted in writing by the supplier.

Any violations that are brought to our attention will be followed up and, in the event of serious breaches, will result in the termination of the business relationship.

[Business Partner Code of Conduct](#)

Department: Global Purchasing

Fair competition

We trust in the competitiveness of our products and services. We and our customers benefit from fair competition. The Zumtobel Group does not participate in cartels and does not enter into agreements with competitors that breach the provisions of antitrust and competition law. This applies in particular to agreements relating to prices, the sharing of markets or customers, the abandonment of competition, and production volumes, or any other manipulation (e.g. fake bids) during tendering.

Employees of the Zumtobel Group must not exchange confidential information with competitors about prices, upcoming price changes, participation in tenders, and customer and supplier relationships or about our calculations or plans. Contacts that might create the impression of illicit arrangements or agreements must also be avoided.

Employees are also urged only to obtain information about competitors from publicly accessible sources. Confidential information from previous employers must not be used within the Zumtobel Group. Offers from third parties regarding the aforementioned confidential information must not be accepted by employees of the Zumtobel Group.

Participation in public tenders is heavily regulated by law and is subject to extremely strict formal requirements, from the initial preliminary discussions through to the fulfilment of the order.

As a participant in such tenders, it is vital to the Zumtobel Group that our employees are familiar with these requirements and that only trained employees have contact with external bodies.

Departments: Sales (global/local), Legal and Corporate Compliance

03

AVOIDING CONFLICTS OF INTEREST

Loyalty and acting in the company's best interests are fundamental values for employees of the Zumtobel Group.

A conflict of interest occurs if, in the course of their work for the Zumtobel Group, employees

- make a business decision for their own personal gain and not based on the company's interests,
- conduct business, in the name of and for the account of the Zumtobel Group, with companies in which they themselves or their immediate family members or life partner are involved,
- run a company, have a stake in a company or work for a company that is in competition with the Zumtobel Group or is involved in activities which compete with those of the Zumtobel Group,
- engage in sideline activities that could constitute a competitive situation for the Zumtobel Group,
- assume or have responsibility, from an HR perspective, for an immediate relative who is also an employee of the Zumtobel Group.

Employees of the Zumtobel Group are obliged to avoid any activities that could lead to a conflict of interests. Should employees of the Zumtobel Group have family or personal circumstances (e.g. sideline activities) that could appear to be

influencing decisions while carrying out their duties, they must report this to their supervisor. Sideline activities must always be authorised in writing. Sideline activities that conflict with the interests of the Zumtobel Group will not be authorised.

Supervisors are obliged to address even potential conflicts of interest in an appropriate manner using technical and organisational measures. For buyers, supplementary instructions on conduct ("Ethical Charter for Buyers") exist in this regard, knowledge of which must be confirmed in writing.

| Department: Corporate Compliance

**WE RESPECT
HUMAN RIGHTS
AND CONDEMN
ALL FORMS OF
DISCRIMINATION.
OUR BEHAVIOUR
IS MARKED BY
RESPECT, HONESTY,
TRANSPARENCY
AND RELIABILITY.**



04 HANDLING INFORMATION

Insider trading

Zumtobel Group AG is listed on the Vienna Stock Exchange and is therefore governed by numerous regulations introduced primarily for the protection of and in the interests of shareholders and the financial market.

To ensure that market participants are treated equally, every employee of the Zumtobel Group is obliged to handle as confidential any specific, non-public information that could significantly influence the stock exchange or market price of the Zumtobel Group share⁴ (insider information) if it were to be made public. It should be assumed that information qualifies as able to influence the stock exchange or market price if a sensible investor would consider this likely.

Examples of confidential information include financial results, new products, changes in key roles, significant contracts and business relationships, strategic plans, major order acquisitions and details about business performance that have not yet been published.

This non-public information must not be passed on to third parties either inside or outside the Zumtobel Group unless this is necessary for business purposes and appropriate measures have been taken to safeguard the confidentiality of the information. Third parties in this sense also include family members or life partners and friends as well as employees of the Zumtobel Group who have no knowledge of the information in the context of their employment.

⁴ as well as with derivatives and other uncertificated securities on these shares.

People who have insider information, have access to such information or accidentally acquire such information as a result of their business activities for the Zumtobel Group are prohibited from exploiting this information to buy and sell shares and other securities on their own behalf or on behalf of others. This ban also extends to recommending or influencing the buying or selling of securities based on insider information. The unauthorised sharing of insider information with others or provision of access to such information is also prohibited.

Information continually arises in the context of projects and in daily business activities which needs to be assessed in terms of its insider relevance. If in doubt, the Investor Relations department must be the direct and first point of contact in order to avoid any unintentional dissemination of the information. The same applies to suspected violations.

| Department: Investor Relations

Commitment to data protection and security

Protecting the personal data of our employees, customers and suppliers is a top priority for us. The same applies to the data of job applicants. The processing of these data is extensively regulated by law, particularly in Europe, most recently through the General Data Protection Regulation. According to the definition given in the EU General Data Protection Regulation, “personal data” include any information relating to an identified or identifiable natural person. “Processing” in this context includes the collection, recording, ordering, storage, alteration, viewing, usage, publication, combination and erasure of such data.

Data protection and data security are both very broad terms and affect nearly all areas of the company.

The Zumtobel Group is aware of the increasing importance of this issue, including for future business segments and therefore has strict guidelines for ensuring compliance with statutory regulations.

Statutory regulations and their interpretation develop rapidly and are only standardised to a certain degree. Nearly every country has its own specific regulations and interpretations. It is therefore the responsibility of the local management to monitor these developments and to adapt regulations where necessary.

Practical advice for employees:

- Familiarise yourself with the local legislation (particularly the key definitions) and internal company guidelines and adhere to these requirements.

- Only process personal data for specific and legally permitted purposes.
- Ensure that data subjects have been adequately informed that a legal basis exists for processing the personal data.
- Protect the data used (see “Information security” section).
- Only collect the minimum data required for the particular purpose.
- Report any suspected data protection violations / data leaks to your supervisor immediately for further investigation and evaluation together with Corporate Compliance.
- Do not store data for longer than is necessary for the purpose of the processing.

Mobile phones and access to email accounts and the internet are provided by the Zumtobel Group for business purposes. Personal use is permitted within the internally defined framework, but must not under any circumstances damage the interests of the company.

We expect our employees to clearly identify personal correspondence/files and to remove them completely when they leave the company.

| Department: Corporate Compliance

Protection of trade secrets – duty of confidentiality

Our innovative products and services are part of the reason we are able to successfully gain competitive advantages over other market players. We try to protect our intellectual property via patents, trademarks, registered designs and copyrights, etc. and we respect valid claims for protection by third parties.

The protection of our intellectual property against disclosure and unauthorised access is of key importance to the long-term success of our company. Details about the organisation and facilities of the Zumtobel Group, prices, revenue, margins and markets, information about manufacturing, research and development processes, figures from the internal reporting system and figures from external reporting systems that have not yet been published are also sensitive and confidential. The same applies to confidential or non-public information from/about business partners, such as customers, suppliers, consultants and other third parties.

All employees are obliged to keep information belonging to their place of work secure and protected against unauthorised access. Sensitive information arising from business transactions must be kept confidential, and this obligation must be adhered to by all employees of the Zumtobel Group even beyond the termination of their employment relationship.

We expect our business partners to formally recognise our interests in protection via standardised non-disclosure agreements. Employees are prohibited from passing on information without such an agreement being in place.

Departments: IP Management, Legal and Corporate Compliance

Information security

We ensure that we comply with an appropriate IT security standard in order to guarantee the integrity, availability and confidentiality of the personal data entrusted to us. With the progression of digitisation and significant increase in cyber crime, there is an ever-growing need for protection in this area.

Employees of the Zumtobel Group:

- do not share passwords,
- ensure that they are using a portal operated within the company network when entering a username/password,
- only use authorised applications,
- are familiar with the common cyber crime attack vectors (e.g. “CEO fraud”, phishing, spoofing, etc.),
- are cautious and check the identity of their contacts as well as the authenticity of documents, particularly when business transactions are due to take place and there is no direct contact with the person concerned.

If you have any suspicions or notice anything unusual, the IT Security Manager of the Zumtobel Group must be informed.

Departments: Corporate IT and Corporate Compliance

Social media and external communication

The Zumtobel Group uses social media for external communication. We cultivate our public image and reputation and make every effort to give a consistent impression to the outside world. To this end, only selected employees are allowed to communicate in the company's name. Only these employees are permitted to publish content on the company's social networks, to add comments, to establish new company channels or to comment on financial results, the company's outlook, any crisis situations, M&A transactions and share developments, etc.

All other employees are expected to do the following on social media:

- show loyalty,
- refrain from divulging any confidential information,
- use their real identity and clearly identify themselves as an employee when commenting (e.g. in forums) on issues relating to the Zumtobel Group,
- add a disclaimer, when expressing opinions, stating that they are personal views and are not an official comment by the company,
- observe the following basic rules when making comments:
 - avoid emotional reactions
 - accept different opinions
 - base responses on facts

and, if in any doubt, inform the relevant department instead of responding in person.

| Departments: Group Communications and Global Marketing

05 USING COMPANY PROPERTY

Physical access controls are essential for the protection of the company and its employees. Location-oriented and task-specific concepts exist, which are communicated and monitored.

All employees must protect property belonging to the Zumtobel Group from damage, loss or misuse.

The use of company property for non-business purposes is not permitted, in principle. Exceptions to this rule must be set out in writing. Company equipment must not under any circumstances be used to collect or pass on information that supports or incites criminal activity or has content that is offensive in light of the cultural setting.

Access rules must be strictly adhered to, not only for external visitors, and any observed violations must be reported.

Unless approval is given by the supervisor, employees of the Zumtobel Group are not permitted to use company property for personal purposes.

| Responsible: Local management

**WE DO NOT
TOLERATE ANY
FORM OF
CORRUPTION. WE
ALWAYS ACT IN THE
BEST INTERESTS OF
THE COMPANY. WE
RESPECT ALL
PROPERTY. WE ARE
COMMITTED TO
FAIR COMPETITION.**



