

# POLICY

## STOELZLE CODE OF CONDUCT

### 1. PURPOSE

The Code of Conduct is binding for all plants and subsidiaries of the **STOELZLE GLASS GROUP**.

The code describes the objectives and rules that reflect our commitment to responsible, ethically irreproachable and legally compliant behaviour.

This code corresponds to the group – wide rules and regulations that govern our business lives and form part of our corporate culture.

### 2. SCOPE

This code is a **STOELZLE GLASS GROUP** code.

### 3. PRINCIPLES

#### 3.1 LAWS AND ETHICAL STANDARDS

We honour the diverse interests of our customers, employees and business partners with integrity fairness and honesty.

We comply with all laws applicable to our business in all regions and countries. We recognize that laws and ethical standards may vary from country to country according to national specifics.

#### 3.2 HUMAN RIGHTS

**STOELZLE GLASS GROUP** is guided by the principles of the United Nations Global Compact.

We respect human rights and conduct our business in a manner that makes us an employer of first choice. We are clearly committed to the elimination of all forms of forced or compulsory labor and to the effective abolition of child labor.

#### 3.3 BUSINESS PRACTICES

Our commitment to quality is a key element to our business. In order to achieve the highest quality standards, we constantly work to improve our structures and processes.

We know that we will be measured by our ethical, social and environmental performance as much as by the quality of our service. We therefore strive for best practice in all these areas to secure customers' trust.

Furthermore, we are committed to openness in our dealings with our customers, suppliers, employers and other organisations and entities.

Transparency and honesty are the guiding principles in our entire communication.

We share principles of ethical behaviour, social engagement and respect for the environment with our suppliers, subcontractors, agents and consultants. We encourage them to adhere to the same standards as we do.

### 3.4 STANDARDS OF WORKING TOGETHER

It is part of our corporate culture that all relations between Senior Managers, managers and employees of all levels shall be guided by mutual respect, openness, honesty and the spirit of trust and cooperation.

We are committed to a fair and open debate and seek varying opinions. We never encourage or direct our employees to achieve business results at the expense of compliance with the law, ethical standards or with this code of conduct.

**STOELZLE** does not tolerate any kind of violence in the workplace. Each employee is required to contribute to an environment of respect. Our employees are free to join or not to join a union / employee representation of their choice.

The main criteria for employment and promotion are skills and qualification. We do not discriminate nor tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under law.

We firmly believe that the well-being and safety of our employees are essential to our success. We are therefore committed to compliance with our health and safety policies.

Each employee has a responsibility to safeguard and make proper use of **STOELZLE** property. Intellectual property is a valuable asset and must be protected from unauthorized use or disclosure. Such property includes trade secrets, confidential information, copyrights, trademarks, logos, but also customer lists, business opportunities and product specifications.

Employees must avoid activities that could involve or lead to the involvement of **STOELZLE** or its personnel in any unlawful practice.

### 3.5 BUSINESS INTEGRITY

We are committed to free enterprise and fair competition. We will hire suppliers, agents and other intermediaries only by careful and fair assessment. We are legally bound to make business decisions in the best interests of the company. **STOELZLE** and its employees will avoid any conduct that violates antitrust laws.

We deal with all our customers, suppliers and authorities in a transparent manner and in compliance with international anti-corruption standards.

None of our employees may solicit gifts or other personal benefits from suppliers, business partners or customers.

Our employees shall not disclose information that is not known to the general public for personal gain or the benefit of anyone other than the company. Such information includes technical data, financial data, operating data, customer information and other information regarding the company’s business, operational activities and future plans.

### 3.6 CORPORATE RESPONSIBILITY

We have integrated corporate responsibility into our corporate strategy. We aim to act responsibly in all our activities and apply our core competencies and the expertise of our employees to make our planet a better place.

We acknowledge the impact of our activities on the environment. Environmental protection is one of the key criteria. We improve our environmental track record through precautionary measure and the use of environmentally friendly technology.

The communities, in which we work, are considered part of our business. We respect the local culture and understand the issues of the communities.

	Date	Position	Name
Issued	15.01.2015	IMS and Quality Director Group	Kloukinas Benjamin
Audited	08.01.2019	Marketing	Marka Doris
Approved	24.01.2019	CEO	Feith Georg