



STOELZLE GLASS GROUP



SUPPLIER CODE OF CONDUCT

Acting responsibly along the supply chain

PREAMBLE

Stoelzle Glass Group is committed to high standards of sustainability and ethical conduct, therefore all our business partners are required to provide safe working conditions, treat workers with respect, act fairly and ethically, and use environmentally responsible practices. We require our suppliers to operate in accordance with the principles contained in this Supplier Code of Conduct and in full compliance with all applicable laws and regulations. This Code outlines expectations for our supplier conduct regarding safety, health, labour and human rights, environmental protection, ethics, and management practices. We expect all our business partners and subcontractors to share the principles which are expressed in this Supplier Code of Conduct and which comprise an important component of supplier selection and evaluation. Moreover, we expect our suppliers to replicate these standards further down the supply chain. This Supplier Code of Conduct is therefore made available to our partners with the goal of strengthening our mutual understanding of how sustainability should be practiced in day-to-day business.

IMPRINT

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This Supplier CoC applies to the following companies and together referred to for the purposes of this document as the Stoelzle Glass Group (or the "Group").

MANUFACTURERS

- Stoelzle Oberglas GmbH (Köflach, AT)
- Stoelzle Union s.r.o (Heřmanova Huť, CZ)
- Stoelzle Częstochowa Sp. z o.o. (Częstochowa, PL)
- Stoelzle Wymiarki Sp. z o.o. (Wymiarki, PL)
- Stoelzle Masnières Parfumerie & Decoration SAS (Masnières, FR)
- Stoelzle Flaconnage Ltd. (West Yorkshire, GB)

FURTHER OFFICES

- Stoelzle Oberglas GmbH (Vienna, AT)
- Stoelzle Glass USA Inc. (New York, USA)
- Stoelzle Glass Russia LLC (Moscow, RU)
- Stoelze Glas Italia srl (Milan, IT)
- Stoelzle Glass Group (Cognac, FR)

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Integrated Management Systems

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CONTENTS

	PREAMBLE	2
1	SUMMARY OF SUPPLIER REQUIREMENTS	4
2	BUSINESS ETHICS	5
	Business Integrity	
	Fair Competition	
	Privacy & Intellectual Property	
	Identification of Concerns	
	Conflict Minerals	
3	LABOUR STANDARDS	6
	Child Labour & Freely Chosen Employment	
	Diversity & Inclusion	
	Fair Treatment	
	Working Hours, Wages & Benefits	
	Freedom of Association	
4	HEALTH, SAFETY, ENVIRONMENT & QUALITY	7
	Quality Requirements	
	Security	
	Occupational Health & Safety	
	Waste & Emissions	
	Resource Conservation & Climate Protection	
5	MANAGEMENT SYSTEMS	8
	Legal Compliance	
	Risk Management	
	Training & Competency	
	Continuous Improvement	
6	REPORTING, MONITORING AND SANCTIONING	9
	Contract with Staelzle	
	Violations of the Code of Conduct	
	Compliance checks	

1. SUMMARY OF SUPPLIER REQUIREMENTS

There are 4 areas where we would like support with and commitment from our business partners:



1. BUSINESS ETHICS

- Comply with the concepts, principles and recommendations in the OECD Guidelines for Multinational Companies
- Prohibit any form of corruption and conduct business in line with fair competition
- Provide means for employees to report concerns & potential unlawful activities
- Ensure that products supplied to Stoelzle are not derived from or do not contain any resources from conflict regions



2. LABOUR STANDARDS

- Ensure equal, fair & humane treatment of all employees regardless of irrelevant characteristics (such as race, gender, age or national origin)
- Support the principles of Equality, Fairness, Inclusion and Respect when dealing with the recruitment and selection of employees
- Prohibit all forms of modern slavery (including human trafficking, forced, involuntary or child labour)
- Respect freedom of association and the effective recognition of the right to collective bargaining by employees
- Support and respect the protection of human rights within their areas of influence



3. HEALTH, SAFETY, ENVIRONMENT & QUALITY

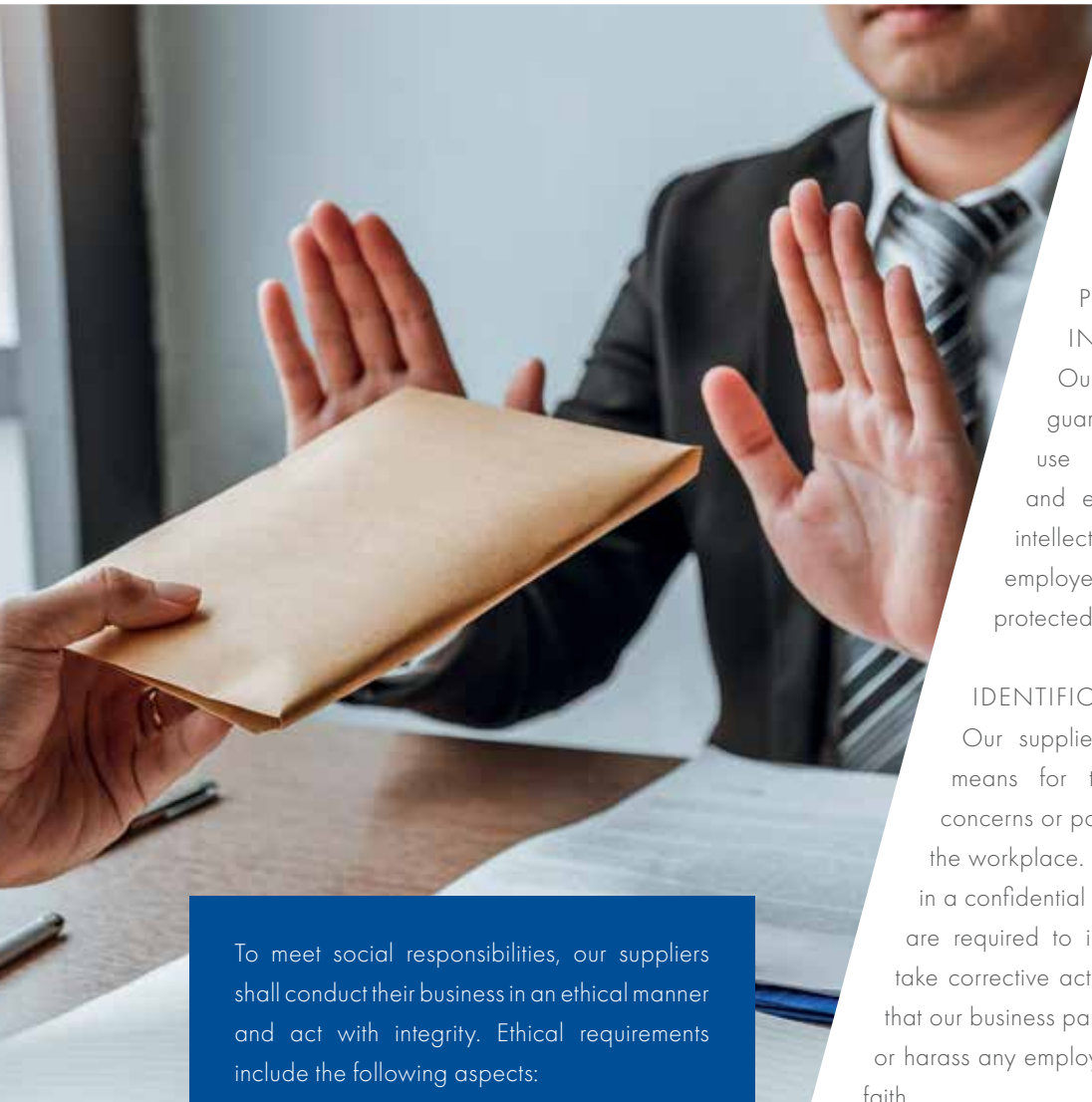
- Comply, as a minimum, with all applicable Health & Safety legislation
- Provide a safe working environment to employees
- Use natural resources in an economical and responsible way and engage in the development of climate-friendly products & processes
- Meet generally recognised or agreed quality requirements and maintain good security practices along the supply chain



4. MANAGEMENT SYSTEMS

- Implement systems to facilitate compliance with all applicable laws and promote continuous improvement of the sustainability and quality performance
- Implement mechanisms to identify, determine and manage risk in all areas
- Support appropriate knowledge and understanding among managers and employees of the contents of this Code

2. BUSINESS ETHICS



To meet social responsibilities, our suppliers shall conduct their business in an ethical manner and act with integrity. Ethical requirements include the following aspects:

BUSINESS INTEGRITY

Our business partners should not engage in or permit any form of corruption, extortion or embezzlement. They are expected not to offer bribes or other unlawful incentives to anyone. Suppliers are also expected not to give or offer Stoelzle's employees a gift of more than a nominal value or any other personal benefit.

FAIR COMPETITION
Our suppliers should conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

PRIVACY AND INTELLECTUAL PROPERTY
Our business partners shall safeguard and make only appropriate use of confidential information and ensure that privacy and all intellectual property rights of both employees and business partners are protected.

IDENTIFICATION OF CONCERNS
Our suppliers are required to provide means for their employees to report concerns or potentially unlawful activities in the workplace. Any report should be treated in a confidential manner, if possible. Suppliers are required to investigate such reports and take corrective action if needed. It is expected that our business partners do not retaliate against or harass any employee making a report in good faith.

CONFLICT MINERALS

Upon request, suppliers are asked to provide information on the country of origin for raw materials in order that Stoelzle can conduct due diligence on the raw materials' source and chain of custody. They are expected to ensure that products supplied to Stoelzle do not contain metals derived from minerals or their derivatives originated from conflict regions.

3. LABOUR STANDARDS

Our business partners are expected to protect the human rights of their employees and to treat them with dignity and respect. This includes the following aspects:

CHILD LABOUR & FREELY CHOSEN EMPLOYMENT

Our suppliers are not expected to use, encourage or engage in human trafficking, slavery, servitude, forced, bonded, compulsory, indentured or involuntary labour. Their employees voluntarily agree to the terms and conditions of their employment without coercion, and can freely terminate their employment. Bonded, indentured or involuntary prison labour is not accepted. Our business partners shall not use, encourage or engage child labour. Child labour means labour that deprives children of their childhood, their potential and their dignity, and which is harmful to their physical or mental development. They shall not employ people under the age for completing compulsory education.

DIVERSITY & INCLUSION

Equal treatment of all employees shall be a fundamental principle of the supplier's corporate policy. Typical discriminatory treatment – consciously or unconsciously – related to irrelevant characteristics of an employee such as race, national origin, gender, age, physical characteristics, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, gender expression or any unlawful criterion under applicable law is not allowed. Our suppliers shall ensure that their employees are not harassed in any way. We encourage our suppliers to provide an inclusive and supportive working environment and to respect diversity when it comes to employees and subcontractors.

FAIR TREATMENT

Our suppliers shall provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, corporal punishment or torture, mental or physical coercion or verbal abuse, or the threat of any such treatment. Furthermore, our business partners are expected not to unfairly terminate any employment contract or without clear evidence specify that the termination of an employment contract, in relation to the working performance of an employee, is permitted by law.

WORKING HOURS, WAGES & BENEFITS

Working hours for suppliers' employees shall not exceed the maximum set by the applicable national law. Compensation paid to employees shall comply with applicable national wage laws. Unless provided by local laws, deductions from basic wages as a disciplinary measure are not permitted. Suppliers are expected to provide their employees with fair and competitive compensation and benefits. Compensation and benefits should aim at providing an adequate standard of living for employees and their families. Suppliers' employees shall be paid on time. It is recommended that our business partners offer their employees ample training and educational opportunities.

FREEDOM OF ASSOCIATION

Our suppliers shall commit themselves to an open and constructive dialogue with their employees and workers' representatives. In accordance with local laws, our suppliers shall respect the rights of their employees to associate freely, join labour unions, seek representation, join works councils and engage in collective bargaining. Our business partners shall not disadvantage employees who act as workers' representatives.

4. HEALTH, SAFETY, ENVIRONMENT & QUALITY



Our business partners are expected to provide a safe and healthy working environment and, if applicable, safe and healthy company living quarters, and to operate in an environmentally responsible and efficient manner. Our suppliers shall integrate quality into their business processes. This comprises the following aspects:

QUALITY REQUIREMENTS

Our suppliers shall meet generally recognised or contractually agreed quality requirements in order to provide raw materials, products and services that consistently meet Stoelzle's needs, perform as warranted and are safe for their intended use.

SECURITY

Our business partners shall have good security practices across their supply chains. They shall maintain processes and standards which are designed to assure the integrity of each shipment to Stoelzle from its origin through to its destination and all points in between.

OCCUPATIONAL HEALTH & SAFETY

Our suppliers are required to provide a safe working environment to employees. They should provide

employees with appropriate procedures and training on occupational health and safety, injury and illness reporting systems, machine safeguarding, safe facilities and medical treatment and/or compensation for illness/injury resulting from the work for the supplier. Our business partners are also required to identify, evaluate, and manage occupational health and safety hazards through a process of hazard elimination, as well as engineering- and administrative controls.

WASTE & EMISSIONS

Our business partners are required to implement systems which ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any of these activities, which have the potential to adversely impact human or environmental health should be appropriately managed, measured, controlled and treated prior to the release of any substance into the environment. Suppliers are also required to install systems to prevent or mitigate accidental spills and/or releases into the environment.

RESOURCE CONSERVATION & CLIMATE PROTECTION

Our suppliers shall use natural resources (e.g. water, energy and raw materials) in an economical and responsible way. Negative impacts on the environment and climate should be minimised or eliminated at their source or through practices such as the modification of production, maintenance and facility processes, materials substitution, conservation, recycling and material reutilization. Suppliers should engage in the development of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions.

5. MANAGEMENT SYSTEMS

Our business partners shall implement management systems to facilitate compliance with all applicable laws and to promote continuous improvement with respect to the expectations set forth in this Supplier Code of Conduct. This includes the following aspects:

LEGAL COMPLIANCE

Our suppliers providing raw material, products or services to Stoelzle are obliged to operate in full compliance with the laws of their respective countries and with other applicable laws, rules and regulations. They shall operate in full compliance with laws relating to labour, worker health and safety, and environmental regulations. To ensure compliance with this Code, suppliers are required to allow Stoelzle and/or any of its representatives to have access to their facilities and to all relevant records upon advance notice and to carry out assessments through supplier assessment tools.

RISK MANAGEMENT

Our business partners shall implement mechanisms to identify, determine and manage risks in all areas addressed by this Supplier Code of Conduct and with respect to all applicable legal requirements.

TRAINING & COMPETENCY

Our suppliers shall establish appropriate training measures to allow their managers and employees to gain an appropriate level of knowledge and

understanding of the contents of this Supplier Code of Conduct, the applicable laws and regulations and generally recognised standards.

CONTINUOUS IMPROVEMENT

Our business partners shall continuously improve their sustainability/quality performance by implementing appropriate measures.

6. REPORTING, MONITORING AND SANCTIONING

CONTRACT WITH STOELZLE

We require our suppliers to pass on equivalent supplier standards to their own suppliers in order to ensure that the supply chain conforms to the values set forth herein. Our supplier shall be held responsible to us for ensuring compliance with the Supplier Code by his employees, company representatives, as well as the subcontractors and any business partners the supplier is using to supply products and/or services when doing business with Stoelzle.

VIOLATIONS OF THE CODE OF CONDUCT

Any violation of this Code has to be reported to us (see below for our compliance contacts). Depending on the gravity of the violation, adequate corrective measures may be requested by us from our suppliers, including the termination of cooperation with an employee or sub-supplier of the supplier. If the requested remedy is not able to prevent or repair harm to Stoelzle or if the breach of the Supplier Code is considered to be a major breach of contract, we shall be entitled to terminate the contract relationship with the supplier immediately.

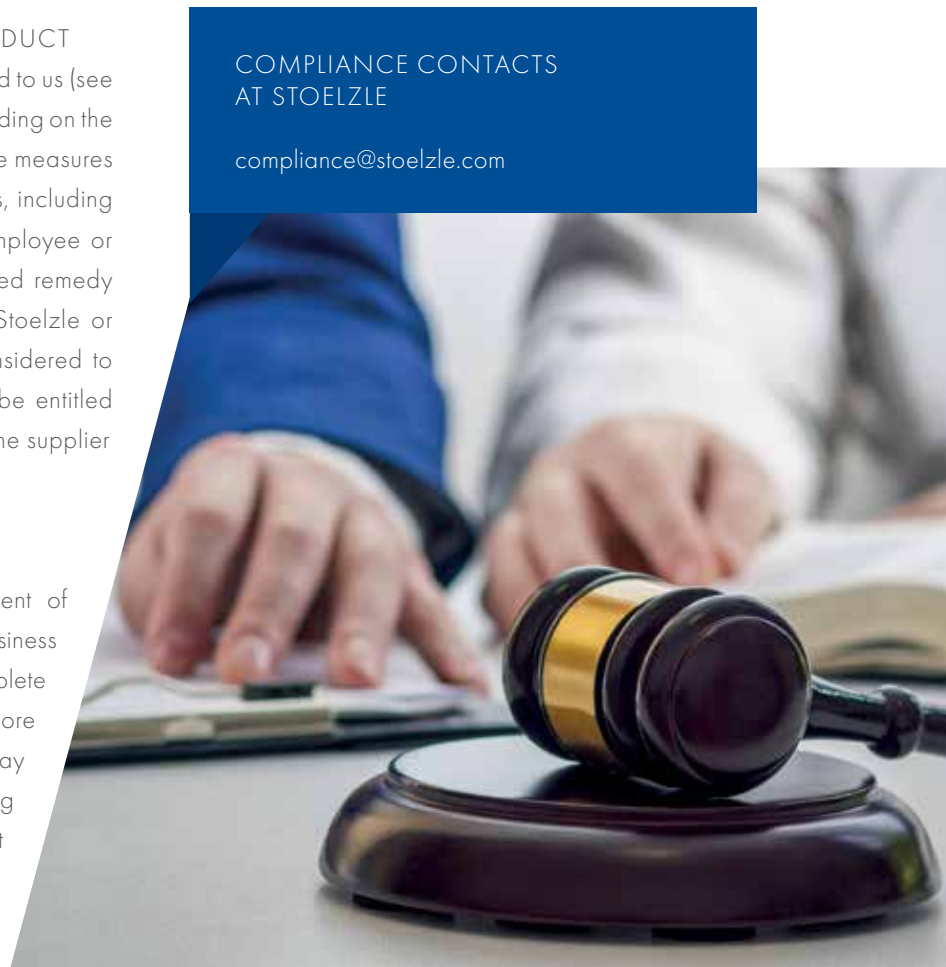
COMPLIANCE CHECKS

Regular monitoring is an important element of our supplier compliance program. Our business partners may, therefore, be invited to complete a supplier questionnaire in order to give more details on his management systems. We may possibly wish to have a face-to-face meeting and an on-site audit to verify important elements of this Code and eventually to define targets together with the supplier. This is part of our efforts to continuously

improve our sustainable supply chain management system. Our business partners shall, therefore, agree to support such compliance checks and audits and not unreasonably withhold any relevant information. Reasonable confidentiality restrictions (non-disclosure) may be agreed upon for such audits, however the supplier shall agree that such data may be disclosed to the customers for whom we intend to use his supplies or services.

COMPLIANCE CONTACTS AT STOELZLE

compliance@stoelzle.com





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