



## Light is everything RZB CODE OF CONDUCT

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RZB CODE OF CONDUCT RZB CODE OF CONDUCT

### FOREWORD FROM MANAGEMENT



#### Dear Colleagues

Formore than 80 years, RZB Rudolf Zimmermann Bamberg Gmb Hhas been dedicated to the development and production of lighting solutions of the highest standard and is now one of the best-known European companies in the lighting industry. The indoor, outdoor and emergency luminaires as well as the light management systems convince with their high quality. Founded in Bamberg, Germany, RZB is a family-run business with global operations. We work with customers, suppliers and partners who come from countries with different cultures, backgrounds and values and accordingly conduct our business responsibly, complying with the pertinent laws and business principles.

This Code of Conduct provides an orientation framework for an effective internal control system to prevent situations which could harm the ethical conduct, trustworthy actions and legitimacy of the company. The Code applies to the entire RZB Group and to each one of us equally – to the directors, members of the executive board and managers as well as every individual employee, because we are jointly responsible for the reputation of our company. This Code is based on our values and constitutes binding rules for ethically and legally responsible actions.

It is intended to guide and support you in your work but it is not to be understood as exhaustive guidelines covering every legal obligation. It serves as a basis to assist you with ethical and legal problems and to reinforce responsible conduct within the company as well as towards business partners and the public.

For this reason, we are asking you, as a member or partner of the Group, to familiarise yourself with our Code of Conduct and to use it as the basis for your day-to-day actions. Because we are confident that if we meet our own corporate responsibility globally, we can enjoy lasting success.

The Management

Dr. a. Zimmermann.

Dr. Alexander Zimmermann

Reiner Jürgens

# OUR CONDUCT TOWARDS BUSINESS PARTNERS AND THIRD PARTIES



#### Free and fair competition

We comply with the statutory provisions on fair competition. RZB wants to gain competitive advantages through its own innovations, products, services and employees. For this reason, compliance with the applicable laws on competition and cartels is mandatory for all employees and partners.

We act independently in the market and do not come to any arrangements with competitors on prices/price components, conditions, market or customer sharing, or production strategies, etc. The exchange of information concerning market strategies is likewise prohibited. It is not just written agreements that are banned but also verbal arrangements and tacit behaviour. We only come to arrangements regarding projects in the field of research and development in limited and agreed exceptional cases.



#### **Combating corruption**

We do not tolerate any form of direct or indirect bribery, corruption or any other gaining of advantages with respect to business partners or third parties. We do not achieve our aims and progress through corrupt behaviour but rather through our products and services. We also expect this conduct from our business partners since our business relationships are not facilitated by gifts, bribery or corruption but rather based on factors such as quality, our ability to meet delivery deadlines and prices.

In order for our employees to protect themselves from undue influence, the acceptance or giving of gifts or invitations is only permitted to a reasonable extent, taking into consideration the internal rules. Invitations to business meals may only be accepted within reason. Gifts and invitations are widespread in day-to-day business in many cultures, however the acceptance of gifts of money and the acceptance or request of personal advantages in connection with such actions is prohibited. Inadmissible gifts must be refused or returned.

#### Supplier and customer relationships

We reach full agreements with our customers and suppliers and document them, including any later amendments and additions. Suppliers are selected after objective evaluation based on the following criteria: Degree of innovation, environmental conformity, performance, quality, price and the products offered.

#### **Conflicts of interest**

We respect our employees' private lives and believe it is important that you do not end up in a conflict of interest or loyalty. It is not permitted to run a company which competes with RZB. Employees may not use their position or accessible information for their own personal gain.

In the event of potential conflict situations or in case of doubt, you should contact your line manager.

# OUR STANDARDS FOR CORPORATE RESPONSIBILITY



#### Fair working conditions

We are committed to supporting each other at work, equal opportunities and mutual respect. Therefore, all of our employees receive the same opportunities irrespective of their origin, religion or ideology, their ethnic background, gender, disability or sexual identity or other personal characteristics and are promoted and paid according to their skills and performance. All of our employees are encouraged to express their opinions freely with respect to improvements in their work and the development of potential is supported.

Discrimination, harassment, unequal treatment for no objective reason, vilification or exclusion will not be tolerated. Likewise, no form of sexual harassment, workplace bullying or verbal abuse will be tolerated and neither will intimidating or hostile behaviour.

All of our employees bear the responsibility for collaborative and fair cooperation at work and beyond.



#### Respect of human rights

We respect the internationally recognised human rights. Any form of forced or child labour is strictly rejected, which is also checked with all suppliers. We are committed to fair, performance-related remuneration. Wages and salaries, including overtime pay, are at least equivalent to the statutory regulations. RZB respects the right of employees to join trade unions and employee representation within the scope of national regulations.

#### Occupational safety and health management

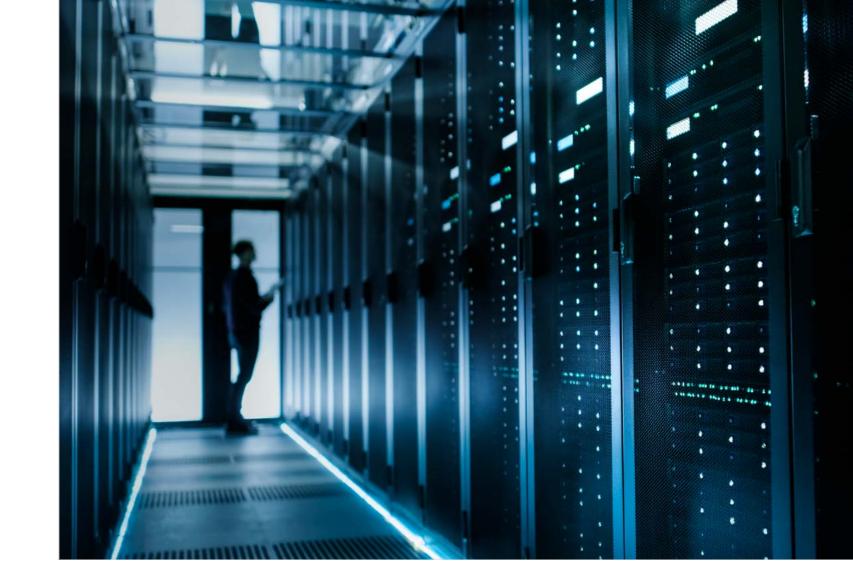
Our top priority is the health and safety of our employees. We place great value on occupational health and safety. This applies both to the planning of ergonomic work places and procedures and to the use of tools and working materials. In order to prevent accidents at work, we regularly carry out occupational safety training, risk assessments and health care measures. We call upon every employee to conduct themselves in accordance with this training and to submit suggestions for improvement in order to meet these requirements and optimise processes.

#### **Environment and climate protection**

Sustainable development is an important corporate goal and means making a commitment to tackling climate change. Resources must be protected by using environmentally friendly technologies and our environmental impact must be reduced.

We are striving to reduce the effects of our products, manufacturing processes and technologies on the environment. During production, regular checks are carried out in order to fulfil RZB's high quality and safety standards. We place great value on the sustainable use of energy, water and raw materials.

# OUR STANDARDS FOR SECURITY AND INFORMATION MANAGEMENT



#### **Data protection**

We strive towards a reasonable level of data protection because the protection of personal data is very important to us and more than just a legal obligation. Data collection is limited to what is necessary and data is only collected with the consent of the data subject to the extent that is necessary for activities at RZB. Personal data is handled and stored as confidential.

Our employees must always comply with statutory provisions and internal company rules on data protection when processing personal data. The processing and use of personal data is only permitted if the data subjects have given their consent or to the extent that is permitted by law.

Personal data which is no longer required for business activities is destroyed by RZB in accordance with statutory and internal guidelines.



#### Information security

We fully safeguard the protection of information and data since information is one of our most valuable assets.

Every employee is obliged to ensure information security and always make sure information is forwarded safely by complying with the internal guidelines. The aim is to protect data and information from loss, damage, forgery or even deletion. The intention is to ensure that the stored data and information is authentic, available at any time, and can be obtained in a transparent manner.

#### **Company property**

The property of our company and company resources that have been entrusted to employees and handed over to them to use must be protected from loss, damage, abuse and theft. It is prohibited to pass them on to unauthorised third parties. Private use of company property is only possible if this has been expressly permitted.

The use of the internet and telephone is allowed during break times if this is in keeping with internal guidelines and RZB's values.

The private use of business email accounts is strictly forbidden.

#### Communication and social media

Every employee is free to use social media privately. However, if an RZB employee can be identified, they must make it clear that posts reflect the opinions of the employee and not of RZB.



# HOW TO HANDLE THIS CODE



#### Reporting breaches

#### Implementation and who to contact

We actively encourage the communication of agreements based on the Code of Conduct. The directors at RZB will ensure that this Code is included in the training programme and that compliance is monitored.

Our managers will act as specific role models. They are the first people to contact in the event of any questions or concerns with respect to the principles set out in the Code. Managers are responsible for ensuring the basic principles of daily interaction amongst colleagues are maintained. They will prevent any breaches of the rules within the scope of their management role and encourage honest and open communication.

Every employee is requested to report any breach or suspicion of a breach of this Code of Conduct to their line manager or to send it anonymously at

#### https://rzb.integrityline.com/frontpage.

Our employees will not be subject to any negative consequences if the reporting procedure is or is not used.

Any report will help us to clarify any misconduct or abuse and therefore protect our employees and the company against harm or risks. The legal department will check every report and if measures are taken, the works council and human resources director will be involved.

A breach of the Code of Conduct may lead to disciplinary action or even dismissal.





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