



ZWIESEL
GLAS

Code of Conduct



„I can recognize our glasses by the way
they sound.“



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I. Introduction

ZWIESEL KRISTALLGLAS AG embodies a corporate culture that is oriented towards business ethics and compliance with all applicable laws. The central concern of this Code of Business Conduct and Ethics (Code of Conduct) is therefore to ensure that all employees behave ethically and with integrity in their business dealings and in their private lives that have a connection to ZWIESEL KRISTALLGLAS AG, and that they strictly observe national and international legal regulations that apply to ZWIESEL KRISTALLGLAS AG.

To this end, ZWIESEL KRISTALLGLAS AG has drawn up this Code of Conduct, which is addressed to you as employees of ZWIESEL KRISTALLGLAS AG and pursues the purpose of preventing misconduct and ensuring conduct with integrity, which also includes the correct classification of actual or perceived conflicts between private and business interests. Corrupt behavior on the part of employees will not be tolerated under any circumstances. Any negligent or willful violations of this Code of Conduct will therefore result in disciplinary measures, up to and including termination without notice. All employees of ZWIESEL KRISTALLGLAS AG must comply with and implement the principles and regulations set out in this Code of Conduct at all times.

II. Principles

As employees of ZWIESEL KRISTALLGLAS AG, you must always comply with the laws, regulations and rules applicable to your tasks and activities. If you recognize a conflict situation, trust your judgment and the principles and rules set out in this Code of Conduct. If you are unsure, you should contact your superior, the HR department or colleagues whom you trust. However, in doing so, please always observe the required reports to the relevant offices listed in this Code of Conduct. It is also possible to make anonymous reports via the portal on the website. The reports are then processed in accordance with the compliance procedure determined by the company management.

III. Corporate ethical sustainability

With this Code of Conduct, ZWIESEL KRISTALLGLAS AG pursues a long-term approach in order to be economically successful in the long term and therefore participates in business activities that are associated with sustainable development for the economy and the environment. Our business partners and suppliers share our principles and our commitment to sustainable, fair and legally compliant behavior. We therefore also commit ourselves to third parties to comply with the laws and standards associated with our business activities, in particular to avoid and refrain from corrupt business practices. If

we do not comply with this requirement, it is not only these principles that are violated. Ultimately, any violation of these principles can jeopardize the economic foundations of the companies of ZWIESEL KRISTALLGLAS AG and thus threaten their existence. The primary goal of ZWIESEL KRISTALLGLAS AG is therefore always to meet the needs and expectations of its customers, business partners, suppliers, shareholders and employees by complying with laws and standards as well as rules of conduct. Impending violations of the law and the associated dangers and risks should therefore be identified at an early stage and thus avoided from the outset. To this end, structures are to be consolidated, promoted and further developed.

IV. Equal rights and opportunities / bullying / discrimination

ZWIESEL KRISTALLGLAS AG promotes a working environment of legal and equal opportunity that is free from any form of harassment or discrimination of any kind. Recruitment, promotion, remuneration or disciplinary measures are based solely on the performance and conduct of each individual, to create a tolerant, open, fair and pleasant working environment. Any form of discrimination, in particular on the basis of race or ethnic origin, gender, religion or belief, disability, age or sexual orientation, is prohibited. Identity and any behavior aimed at intimidating or belittling the personality, in particular so-called bullying, is prohibited and will not be tolerated

at any time, regardless of whether this takes place in the company, within the company, in a customer or supplier-related context, in dealings with third parties, through the use of our communication systems or otherwise. Insulting, harassing or offensive behavior or conduct by employees or customer or supplier representatives is therefore unacceptable and will not be tolerated, regardless of whether it is of a verbal, physical or visual nature. Examples of this include derogatory remarks about ethnic characteristics, sexual or religious orientation or other characteristics that are protected by law. Likewise, any form of sexual harassment, including unwanted advances in the workplace, is - of course - prohibited and will not be tolerated at any time. If you are uncomfortable with the behavior of an employee, customer or supplier representative, speak up and report any harassment immediately. In the event of harassment or discrimination, please contact the HR department, the works council, the anonymous reporting portal or the management. You will receive support there.

V. Occupational health and safety

ZWIESEL KRISTALLGLAS AG ensures a clean, safe and healthy working environment. It is the responsibility of every employee to ensure safety in the working environment and at their own workplace by observing the rules for health and safety and by complying with health and safety regulations and the specified work processes. Please report accidents, injuries, dangerous work

equipment and unacceptable working conditions or work processes immediately to your superior, the HR department or the management.

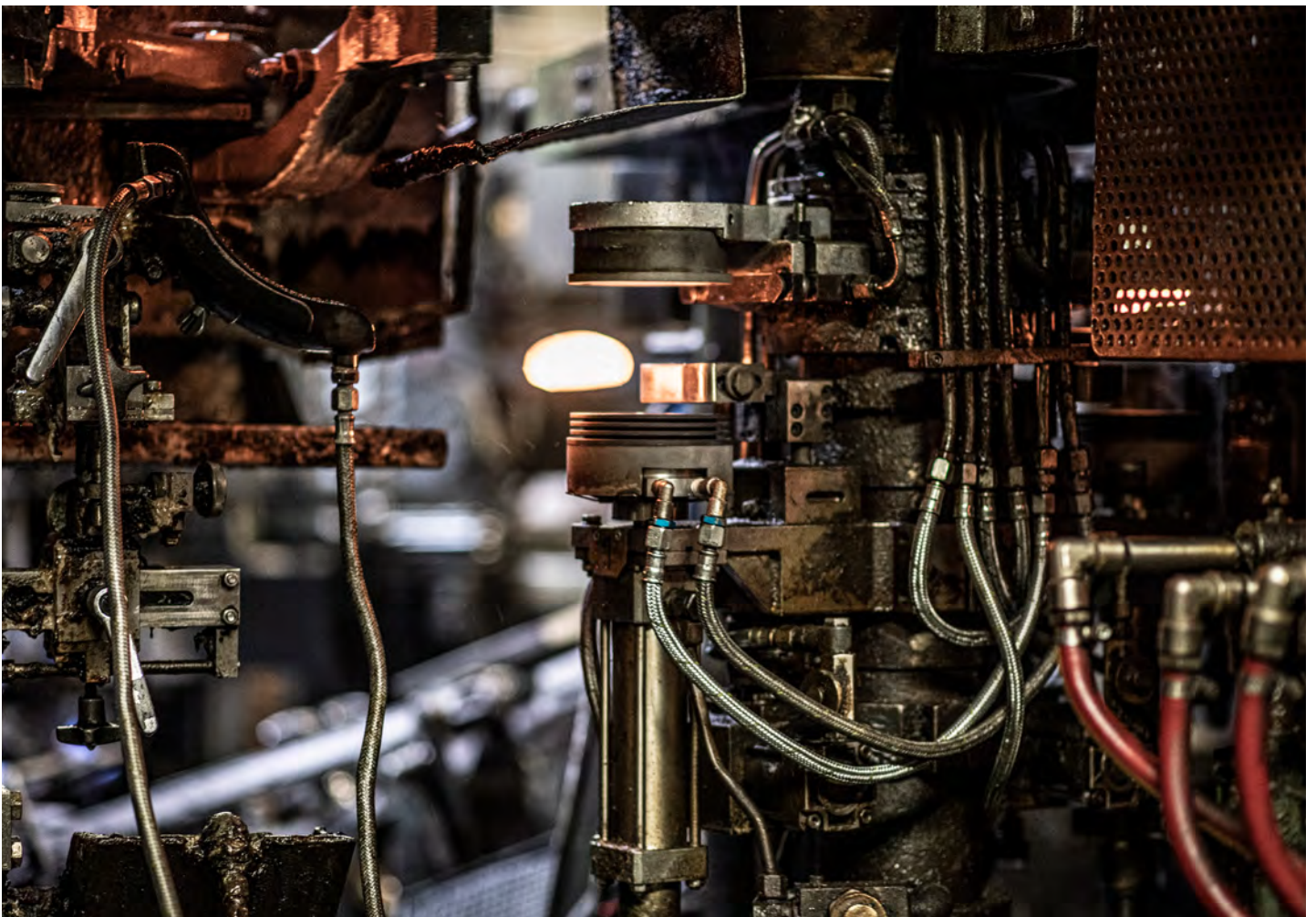
VI. Prohibition of child and forced labor

ZWIESEL KRISTALLGLAS AG prohibits any form of child or forced labor and employs only those employees who have voluntarily made themselves available for employment. The use of corporal punishment (violence) and psychological or physical coercion (intimidation) is prohibited. The minimum age for admission to employment may not be less than the

age at which compulsory schooling ends and in no case less than 15 years of age. If ZWIESEL KRISTALLGLAS AG employs young workers, it must be ensured that they are not exposed to excessive physical risks and that the work does not harm their health or their development.

VII. Conflicts of interest

Conflicts of interest arise when your own interests interfere with or may interfere with your work duties or the interests of ZWIESEL KRISTALLGLAS AG. Therefore, you should not represent ZWIESEL KRISTALLGLAS AG in any action





For those
who care.

or within the scope of a business relationship in which you or a close relative or friend have a personal financial interest.

Never use your position or the property of ZWIESEL KRISTALLGLAS AG for personal gain. Every employee is prohibited from abusing his or her own position or the property of ZWIESEL KRISTALLGLAS AG for personal gain. Any conflict of interest must be reported immediately to the superior, the HR department or the management. In addition, you should not conduct any private business with customers or suppliers of ZWIESEL KRISTALLGLAS AG if this results or may result in any influence. Furthermore, without the express consent of ZWIESEL KRISTALLGLAS AG or one of its companies, you may not engage in or accept any activities outside of ZWIESEL KRISTALLGLAS AG, including membership in other companies, which may impair or interfere with your duties within ZWIESEL KRISTALLGLAS AG or its interests.

VIII. Gifts, gratuities and invitations, bribery

Any form of bribery, for whatever purpose and both in the private and public sector is prohibited. Gifts of minor value and invitations may be accepted as an exception as a customary sign of appreciation and courtesy between business partners in the private sector as long as this is socially appropriate and the requirements for tax deductibility as a business expense are met. Irrespective of this, gifts

must never influence decisions or be used for this purpose. Please bear this in mind:

- There is little difference between permissible gifts that are an expression of appreciation or serve to build a good, personal business relationship and bribery or corruption.
- Problems arise when gifts and invitations to or from business partners impair or are likely to impair our ability or that of our business partners to make objective and fair business decisions based solely on the interests of the company.
- Unauthorized gifts, gratuities or invitations are often made secretly or indirectly. Repeated gifts, even if they are individually modest or permissible, can have the effect of creating an inappropriate obligation towards the giver and are no longer acceptable in their entirety.

Do not accept or offer any gifts, gratuities or invitations that could be considered inappropriate, unfair or illegal influence on a business relationship or decision. This also applies to those times of the year when gifts are usually given.

Rely on your common sense. If it is difficult for you to decide whether certain gifts or invitations fall within the boundaries of acceptable business practice, ask yourself the following:

1. Which groups of people should be treated with caution? In particular, you should exercise caution when granting gifts, benefits or invitations to public officials (civil servants, employees of authorities and public corporations, municipal companies or judges, soldiers, etc.) and to all employees and agents of private companies. Employees and agents of private companies must exercise caution if they work in this capacity.
2. Is my behavior clearly business-related and within an appropriate framework? Is my behavior inappropriate?

If you have any doubts, please contact your superior or the management.

ZWIESEL KRISTALLGLAS AG prohibits any form of bribery and corruption and will not

tolerate such behavior by its employees and will pursue it immediately.

IX. Company property, criminal acts, confidentiality

All trademarks and brand names as well as designs of ZWIESEL KRISTALLGLAS AG are protected as copyrights and intellectual property rights. These rights must be protected so that customers of ZWIESEL KRISTALLGLAS AG companies can be sure at all times that they have purchased genuine, authentic products. At the same time, we protect the rights of third parties. The property of ZWIESEL KRISTALLGLAS AG, including funds, computers, goods or other products, may only be used or utilized for permissible business and authorized purposes



and may not be used unlawfully under any circumstances. ZWIESEL KRISTALLGLAS AG does not tolerate any criminal acts, such as fraud or embezzlement, and will cooperate constructively and unconditionally with the investigating authorities and other government bodies at all times. Business information of ZWIESEL KRISTALLGLAS AG may not be used outside the company's internal environment; this also applies after leaving ZWIESEL KRISTALLGLAS AG. Do not hesitate to inform your superior or the personnel department or the management, or submit an anonymous report via the reporting portal if you have reasonable suspicion of a criminal offense at ZWIESEL KRISTALLGLAS AG or other criminal or fraudulent activities related to the company. The ZWIESEL KRISTALLGLAS AG will immediately initiate all required or necessary measures if its property is stolen or misused, criminal or unauthorized acts are committed, trade or business secrets and related documents or records and data carriers are misused or published, forged or other confidential items belonging to ZWIESEL KRISTALLGLAS AG are used without authorization. The management will set up appropriate and suitable control mechanisms to prevent risks of fraud and misuse in compliance with data protection laws.

X. Business documents and communication

All documents and communications written by employees are company documents and may be presented or used in legal proceedings or investigations by supervisory authorities or other

authorities and may become public knowledge as a result. Information may be disclosed to internal and external auditors, legal advisors and the Compliance Officer at ZWIESEL KRISTALLGLAS AG or persons authorized by it.

XI. File storage

ZWIESEL KRISTALLGLAS AG stores files and business documents properly and in compliance with the law. Business documentation is an asset and must be handled with care. Business documents, including e-mails, must be stored in accordance with the relevant statutory retention periods and the internal retention guidelines of ZWIESEL KRISTALLGLAS AG or destroyed after expiry. Business documents and business correspondence that are the subject of regulatory, judicial or official investigations may not be altered or destroyed.

XII. Financial documents

All business transactions of ZWIESEL KRISTALLGLAS AG are supported by correct and legally compliant accounting and documentation. Cash transactions are to be avoided and reported to the management in advance. Transactions above the legally permitted limit – currently EUR 10,000.00 – are strictly prohibited from the outset.

The correct and legally compliant recording and reporting of information are of crucial importance and a prerequisite for making responsible business decisions. Reports for the

management, creditors and government bodies or other third parties are based on the business documents.

The business books of ZWIESEL KRISTALLGLAS AG must:

- reflect all business events and transactions correctly and completely at all times
- comply with all laws and accounting regulations
- comply with the internal control system of ZWIESEL KRISTALLGLAS AG.

False or misleading entries in the books of account are strictly prohibited.

XIII. IT systems, E-mail

The IT systems (PC, e-mail, intra- and Internet and other telecommunications equipment) of ZWIESEL KRISTALLGLAS AG may only be used for lawful and operational purposes. The unauthorized use of e-mail, intra- or internet or other telecommunication facilities of ZWIESEL KRISTALLGLAS AG may have consequences under labor law and other legal consequences. Please note that e-mails constitute business documents and may be used as evidence in court or in regulatory investigations. Express reference is made to sections IX and X.

Always make sure that you use appropriate language in emails or other communications. If you are unsure, ask yourself whether the content would be quotable in the event of publication. ZWIESEL KRISTALLGLAS AG is entitled, to the extent permitted by law and if required or necessary for security or operational reasons, to

access e-mail or the intranet, to check and trace the process and to monitor Internet activity.

XIV. Data protection and confidentiality

ZWIESEL KRISTALLGLAS AG protects and respects the personal data and privacy of individuals. Personal data may only be processed under the conditions of the applicable data protection laws. If you have any doubts about how to handle personal data, please contact the data protection officer, your superior, the HR department or the management.

Make sure that people who entrust you with personal data are aware of the purposes for which it is processed. Check whether the data provided to you is correct and only keep it for as long as it is actually needed for the original purpose. Protect personal data from misuse.

XV. Behavior in the market environment

ZWIESEL KRISTALLGLAS AG and its companies do not make negative, unobjective or derogatory statements about competitors, their employees or products.

ZWIESEL KRISTALLGLAS AG does not enter into any agreements with competitors on commercially sensitive issues such as prices, business or supply conditions or market allocation. The competition regulations apply not only to formal agreements, but also to loose,



informal arrangements, confidential agreements or so-called gentleman's agreements.

Do not enter into any agreements with competitors and in particular do not exchange information with them about:

- Conditions for products or customers
- Nature, content, scope or amendment of these terms and conditions
- Division of markets according to sales territories or customers

If in doubt, please contact the management.

XVI. Insider trading proceedings

The statutory regulations prohibit persons who possess material information that is not generally known or accessible to the public from trading in securities.

Employees of ZWIESEL KRISTALLGLAS AG companies are not permitted to trade in shares or other securities of ZWIESEL KRISTALLGLAS AG companies while in possession of material, non-public information about the company concerned or to disclose material, non-public information or to advise third parties to trade in shares or securities on the basis of material, non-public information about the company concerned without the express authorization of the company concerned.

XVII. Confidentiality

All employees of ZWIESEL KRISTALLGLAS AG must maintain the confidentiality of company and business secrets, including associated documents and data carriers as well as information, at all times. The unlawful use of legally protected business secrets is a criminal offense. In addition, ZWIESEL KRISTALLGLAS AG or its customers may be harmed or competitors may be given an advantage, which may also result in claims for damages. The obligation to maintain the confidentiality of trade and business secrets and related documents and data carriers as well as information continues to exist even after the termination of your employment.

Confidential business information of ZWIESEL KRISTALLGLAS AG, including information about its customers or suppliers, may at no time be used for personal gain or misused for unauthorized purposes. Business records or other operational documents that contain confidential and/or legally protected information may only be used by employees for operational and task-related purposes.

Only pass on information internally or externally if the recipient has a legitimate need to know or use it. Beware of careless gossip in social settings, such as conversations on public transportation (including on mobile devices) or in confined spaces such

as elevators in the presence of third parties,
and always maintain confidentiality.

XVIII. Control and consequences of violations

To ensure compliance with the guidelines set out in this Code of Conduct, the management will carry out regular spot checks and inspections in compliance with data protection laws. If violations by employees are detected, consequences under labor law must be expected, up to and including extraordinary termination without notice and the initiation of criminal proceedings. If you become aware of violations of laws, regulations, requirements or other provisions as well as violations of this Code of Conduct by employees of ZWIESEL KRISTALLGLAS AG, these violations must be reported immediately to the management. Anonymous reports will be processed in accordance with the procedure laid down in the HinSchG.

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