
Code of Conduct

ZIEGLER GROUP

Preamble

Dear employees,

As a global and modern working family company with more than 1,500 employees across the entire group, the ZIEGLER GROUP with its regional roots is committed to ecologically and responsible and sustainable corporate management in every respect.

We are convinced that a business policy that is strictly based on ethical principles and adheres to the law and principles is best in the long term for everyone involved – for our own employees as for our partners, their employees and ultimately also for the ZIEGLER GROUP itself.

By working out the following *Code of Conduct* we did determine codes of practice for our suppliers and partners. They are intended to serve as orientation and represent basic requirements in order to be able to decide and act accordingly in everyday professional life. The management's goal is the unconditional compliance with legal and ethical standards, a sustainable environmental and climate protection as well as the creation of a working environment that promotes integrity, respect, and fair behaviour. We feel obliged to do so.

I. Social Responsibility

Respect for human dignity and fundamental ethical values

The ZIEGLER GROUP respects human dignity and is committed to the observance and protection of human rights. Every employee is obliged to ensure that these generally applicable basic rights are observed. Thus, violations of fundamental ethical values by suppliers/business partners, such as the prohibition of inhumane working conditions, forced labour, unfair remuneration or inappropriate working hours, etc., are also unacceptable. Suppliers/business partners are also committed to our *Code of Conduct*.

Mutual respect and responsibility for the corporate image

We do not tolerate any discriminatory behaviour towards employees or applicants on the grounds of ethnic or national origin, colour, sex, religion or belief, disability, age, sexual identity or other grounds covered by the prohibition of discrimination. Everyone should have the same opportunities. Each individual is responsible for creating a working environment characterized by tolerance, trust and respect.

The ZIEGLER GROUP is also aware of its obligation to protect the privacy and personal rights of all employees and business partners.

Every employee, no matter which level of the company he/she belongs to, be it manager, specialist or temporary employee, is treated with the same respect. Just as ZIEGLER GROUP always strives to act fairly, honestly and respectfully, especially towards its employees, every employee must be aware that the ZIEGLER GROUP's public image is largely determined by his/her appearance. Therefore, managers as well as other employees are always expected to behave and act in a manner that is conducive to the company's image.

Compliance with laws

All applicable laws must be observed by the ZIEGLER GROUP and its employees. Violations can be punished with labour law measures up to and including dismissal. Employees are paid fairly and receive all the benefits prescribed by national law. Working hours must not exceed statutory regulations and industry standards.

Against sexual harassment and bullying

In accordance with the above principles, the ZIEGLER GROUP prohibits in particular sexual harassment, other harassment and insult as well as bullying of any kind by their employees and takes decisive action against sexual harassment and bullying to the detriment of its employees also by external parties (customers, suppliers). We strive to create a working environment that promotes respect and equal opportunities.

We prohibit unwanted sexual advances/sexual harassment, prompts for sexual services and other verbal or physical behavior of a sexual nature, as well as sexually offensive acts in the professional environment or in any other way. Failure to do shall, without exception, result in the adaptation of any measures permissible under labour law to sanction such conduct.

Examples of illicit sexual harassment are:

- Sexually physical touches, such as narrowness patting, pinching and touching or other unwanted bodily contact with sexual content;
- call for sexual actions or sexual offers for benefits in the workplace;
- public conjecture or repeated inquiries about a person's sexual life;
- jokes, remarks or allusions to sexual content about a person or men and women in general; or
- unwanted pointing or visible attachment of pornographic images at the workplace.

ZIEGLER GROUP also resolutely prohibits harassment and bullying of any kind by its employees. Harassment, insult or joke on the grounds of race, colour, creed, religion, national origin, citizenship, age, sexual orientation, marital status or mental, physical or other individual characteristics or conditions of a person shall not be tolerated.

In particular, bullying also includes intentional or unintentional verbal behaviour by one or more persons against another person, which is carried out continuously and systematically over a certain period of time and reduces or excludes the target person.

Employees and also external parties and explicitly requested to report suspicions of such actions. Disciplinary measures of a labour law nature against the reporter are prohibited – employees can rely on this!

Contact person for suspected sexual harassment, abuse of power is

Ms Héloïse Radtke

E-Mail: heloise.radtke@ziegler.global

Tel.: 09636 9209 – 1462

Of course reports will be treated absolutely confidentially!

Safety at work and health protection

All employees of the ZIEGLER GROUP must ensure a safe and healthy working environment. Strict compliance with our safety regulations and practices is an essential requirement. The employees are obliged to immediately report violations of these principles to the responsible departments in the company. Any grievances must be rectified immediately.

II. Ecological responsibility

Environmental protection

The ZIEGLER GROUP strives for the responsible and sustainable use of natural resources in its business activities – after all, our sawmill division is dependent on wood as a natural resource. We are therefore constantly striving to obtain our raw materials from efficient and sustainable forestry. Our employees are encouraged to use natural resources appropriately and sparingly and to ensure that their activities have as little impact as possible.

Energy efficiency

In order to keep the environmental emissions resulting from all production processes within limits, the ZIEGLER GROUP is committed to constantly working on reducing energy consumption per production unit and to sustainably increasing energy efficiency in a continuous improvement process in every part of the company. To implement these goals, an energy management system was established at an early stage and certified in 2012. Through the analysis of energy-relevant areas, energy management generates a sense of responsibility among all employees with regard to the daily implementation of potential savings. In this way, the ZIEGLER GROUP makes a contribution to global resource, climate and environmental protection.

III. Market-economy responsibility

Fair competition

The ZIEGLER GROUP supports fair and undistorted competition in compliance with competition and antitrust law. This means, for example, that none of our employees holds discussions with competitors in which prices or services are agreed or other prohibited agreements are made about market behaviour. Agreements with business partners and third parties regarding a waiver of competition or the allocation of customers and territories are also inadmissible. In addition, improper preferential treatment or exclusion of contractual partners is prohibited. The ZIEGLER GROUP also expects its business partners to be committed to the principles of a free market economy and fair competition.

International activity and export control

As a company operating in numerous markets around the world, compliance with international treaties and local national laws, as well as regulations to control international trade transactions, is a top priority. In particular, the ZIEGLER GROUP complies with internationally and nationally applicable export and import laws as well as customs regulations. Special attention is paid to the strict observance of all sanctions and embargoes as well as all other laws, regulations and official orders - to ensure this, an electronically supported export control system has been set up specifically for this purpose.

Protection of corporate property

The property of ZIEGLER GROUP should be used responsibly and appropriately. The private use of corporate property is prohibited unless expressly permitted by a separate agreement.

Protection of intellectual property

In every respect the protection of intellectual property is essential for the ZIEGLER GROUP. This includes, among other things, confidential information, trade secrets or customer lists, but also copyrights, patent rights, trademark rights or design rights. Both the intellectual property of the ZIEGLER GROUP as well as the intellectual property of business partners and third parties are to be protected.

Prohibition of corruption and conflicts of interest

The ZIEGLER GROUP is committed to fighting corruption and bribery. Conduct that initiates or conducts business with unfair means will not be tolerated. Employees of the ZIEGLER GROUP must not offer, receive or accept any benefits from business partners that could impair or even appear to impair an objective and fair business decision.

The ZIEGLER GROUP expects loyalty to the company from its employees. All employees must avoid situations in which their personal or financial interests conflict with those of the ZIEGLER GROUP. It is therefore prohibited in particular to invest in competitors, suppliers or customers or to enter into business relationships with them in a private environment if this could lead to a conflict of interest.

Such interests of conflict can arise in many situations: Thus, no employee may accept advantages – in any form whatsoever – which, from a reasonable point of view, could be expected to influence business decisions or transactions of the ZIEGLER GROUP. Invitations must remain within the bounds of normal business hospitality. Due to their position in the ZIEGLER GROUP, employees should not gain direct and/or indirect advantages through access to confidential information. All employees have the duty to promote the legitimate interest of the ZIEGLER GROUP as fast as possible. Any competitive situation with the company must be avoided.

Data protection

Within the scope of our business activities, we collect, process or use personal data of clients, customers and employees. The ZIEGLER GROUP regards the protection and responsible handling of this and other confidential data as a basic prerequisite for business success. We actively implement and comply with the requirements resulting from the DSGVO, the Federal Data Protection Act and other data protection regulations. Measures are taken which are suitable for this purpose depending on the type of personal data to be protected. Within the ZIEGLER GROUP, compliance with data protection regulations is monitored by an appointed data protection officer who is equipped with the necessary expertise and the necessary resources for the area of activity. In his work, the data protection officer is not subject to instructions and reports directly to the management.

IV. Implementation of the Code of Conduct in the ZIEGLER GROUP

The management of the ZIEGLER GROUP assures that the principles and ethical values of these rules of conduct are communicated to all employees and partners of the company/supplier in an appropriate manner and on a regular basis. It also updates the Code of Conduct at regular intervals.

Violations of this Code of Conduct are unacceptable. Every employee who violates of this Code of Conduct must expect consequences in accordance with labour law or other legal regulations.

We encourage all our employees to report violations immediately to the compliance department at

compliance@ziegler.global or 09636-9209-1339

or rather in case of harassment to the above mentioned assigned employee.

The company is committed to ensuring that there will be no consequences for employees if they report violations or even in good faith alleged violations of the Code of Conduct.

Plößberg, September 2020



Stefan Ziegler, CEO