

1. Preamble

Thonet is one of the oldest family-managed furniture manufacturers in the world and has been producing living and contract furniture of the highest quality since 1819. The courage to dare and venture into new things – with pioneering technologies and outstanding design – while not forgetting the roots of the company's long tradition has made Thonet famous throughout the world. All activities are characterised by the combination of form, function and aesthetics.

Thonet strives towards a balance between profit-oriented growth, the protection of the environment and responsible actions towards all interest groups. The company acts holistically, sustainably and with social responsibility with regard to its management, the environment, social responsibility on site and internationally, as well as the consideration of cultural heritage while observing laws and regulations.

The trust of clients, colleagues and the public decisively depends on the credibility, correct conduct and commitment of every individual. Every employee thus influences the image of Thonet and, as a consequence, how we can successfully assert our position in the market.

This code of conduct is a guideline – it strengthens mutual understanding, supports us in doing our everyday work and, ultimately, being successful in global markets. The principles defined in this code of conduct are established goals; each employee and the management of Thonet strive towards implementing them. They aim to help manage legal and ethical challenges during our daily work, create an orientation, and thus strengthen the trust in the performance and integrity of Thonet.

The ethical guidelines described in this code of conduct are especially based on the principles of the UN Global Compact (attachment), the ILO conventions, the general Declaration of Human Rights of the United Nations, the UN Convention on the Rights of the Child and on the abolishment of any form of discrimination against women, and the OECD guidelines for international companies.

All employees maintain the highest possible degree of reliability and personal and professional integrity with regard to all job-related matters. Every employee preserves the high reputation and good image of Thonet and refrains from any actions that might have a negative influence on Thonet. The term “employee” refers to male and female full-time and part-time employees, managers, managing directors and members of the advisory council.

Every employee can contact their supervisors if they have questions or wish to provide input.

2. General principles, laws and legal regulations

As a general rule, we comply with and observe laws and legal regulations. All employees are obliged to observe the legal regulations and other requirements such as valid accreditation requirements. The same applies to internal guidelines, principles and rules of business.

We do not get involved in activities that are clearly aimed at undermining legal or other regulations and rules. We also observe all of the laws, regulations and standards we are familiar in the countries in which we are active. With regard to the validity for our professional environment, we comply with the aforementioned laws, regulations and standards provided they do not conflict with universal ethical principles. Every employee is requested to responsibly deal with corporate property and possessions.

3. Social responsibility principles

al Human rights: Thonet respects and supports the observation of internationally recognised human rights.

bl Compulsory labour: Thonet rejects any form of compulsory labour.

cl Child labour: Thonet observes the conventions of the United Nations on human rights and children's rights. Thonet is especially committed to observing the minimum age convention for employment (convention 138 of the International Labour Organisation) and the convention on the prohibition and immediate action for the elimination of the worst forms of child labour (convention 182 of the International Labour Organisation). If a national regulation concerning child labour sets stricter standards, these shall have precedence.

dl Anti-discrimination: All employees are expected to respect the personal dignity, privacy and personal rights of all individuals.

We do not tolerate discrimination based on age, gender, sexual identity, race, religion or disabilities. Personal or sexual harassment and abusive language are prohibited. It is strictly forbidden to apply violence or to threaten the use of violence or physical punishment.

el Protection of employees: All employees are protected by standards that concern health and safety in the workplace. National law and international conventions as well as internal corporate agreements with the employee representative organisations are applicable. They are open to all employees. Thonet supports the continuous improvement of the world of work.

fl Fair working conditions: Thonet respects the right of its employees regarding freedom of association within the framework of the applicable rights and laws.

gl Environmental protection: Thonet is actively committed to the protection of the environment and has emphasised this commitment in its guiding principles, environmental guidelines and environmental goals as well as corporate policies.

Since we committed to deliver services in the interest of humans and the environment, Thonet mandates that all employees consider the consequences of their actions on humans, the environment and society. All employees are aware of the environmental impacts of their activities and avoid or reduce damages to the environment within the framework of their potential influence. Laws that were passed to protect the environment have to be observed. Thonet supports the environmentally aware actions of its employees.

hl Trade secrets: Thonet requires its employees to observe trade and business secrets. Confidential information and confidential documents may not be forwarded to third parties or made accessible in any other form without prior consent unless duly authorised or in the case of publicly available information.

4. Conflicts of interest

Employees are to avoid situations that may lead to personal conflicts of interest. Unavoidable personal conflicts of interest have to be reported to the supervisor. In case of doubt, a commissioner may be consulted.

4.1 Avoiding the collision of private and business interests

Every employee is requested to avoid conflicts of interest between private and business interests. The following rules apply:

- Offers and contracts may be made and signed only for business and competitive reasons.
- Procurements have to be in line with the corporate rules of sourcing and procurement.
- Individual financial interests in or personal advantages through clients, suppliers or other business partners of Thonet contradict our principles.
- Direct participations in suppliers, clients or companies to be acquired represent potential conflicts of interest.

4.2 Offering and accepting benefits/gifts

Non-cash personal benefits as a compensation for preferential treatment in business dealings may not be offered, promised, granted or accepted. Also, when dealing with business partners, personal benefits of any value may be not demanded nor accepted.

When fulfilling their business obligations, Thonet employees may not offer, promise, demand, grant or accept any benefits, gifts, payments, invitations or services that are granted with the intent to influence a business relationship in an unacceptable way or that may suggest a compromising of the professional independence of the business partner. This is generally not the case with gifts and invitations that move within the framework of usual business hospitality, customs and politeness.

Gifts or invitations to business partners have to be limited and may not be aimed at influencing a business decision or understood as such. The general business practice defines the boundaries for gifts and invitations; they are subject to change and individually defined following the principle of appropriateness.

Gifts and invitations, the value of which goes beyond the “locally customary” – i.e., a boundary defined by customary rights – are prohibited.

al Corruption: When dealing with business partners (customers, suppliers) and state institutions, the interest of the company and the private interests of employees on both sides are strictly kept separate. Actions and (purchase) decisions are free from extraneous considerations and personal interests.

The applicable corruption laws have to be observed. Among others, the following issues need to be observed:

- Offences involving the complicity of state officials: The impartiality and integrity of civil servants must not be damaged. Therefore, civil servants, state representatives, representatives of supervisory authorities, politicians or representatives of other public institutions are not permitted to receive any offers, gifts or invitations for lunch or dinner or events that would damage their impartiality and integrity.

Invitations for lunch or dinner are permitted only within the framework of the law or local customs. The impression of granting or accepting advantages must be avoided. Authorities or their representatives may not be promised or paid any monetary or other advantages for themselves or third parties for any kind of services or services rendered. Exceptions are the payment of penalties and fees issued by authorities, which have to be published. Bribes or kickbacks are prohibited. Corruption is a crime and is generally prosecuted.

- Offences in business transactions:

Non-cash benefits as a return service for preferential treatment in business transactions may be offered, promised, granted or accepted. When dealing with business partners, personal benefits of value may not be requested or accepted. Thonet requires its employees to not accept promises of such benefits.

bl Money laundering: All employees ensure that business activities of Thonet are not abused for illegal purposes such as money laundering. Financial, material or immaterial services without return service ("Sponsoring") are fundamentally permitted and limited as part of and through the framework of the explanation "Charity and Sponsoring" (item 7). Funds, purposes and uses have to be documented appropriately and in a way that make them verifiable. In the case of doubt, the central unit appointed (e.g. Finance/Taxes) or management must be informed and asked for advice.

cl Antitrust laws: Compliance with competition laws and the integrity of competition: Thonet follows the principle that economic and business goals should be achieved in a fair and legal manner. We believe in free and socially responsible order in the market. We distance ourselves from any kind of activity that aims to achieve business advantages through illegal or unethical conduct and comply with the applicable laws that protect and promote competition, especially the applicable antitrust laws and other laws that regulate competition.

In particular, it is not permitted to conclude price agreements with competitors or to discuss or agree on the distribution of regions, clients or supply resources with competitors. Furthermore, an exchange of information with competitors that could be interpreted as an agreement on prices, price changes, rebates or pricing components, terms of business, cost, capacities, technical developments and investments, the submission of tenders or a joint action against suppliers or clients is not permitted. The submission of a parallel tender without the intention of closing the deal and instead informing the competitors or influencing the prices is also not permitted. We distance ourselves from making untrue or misleading claims for advertising purposes.

5. Customer orientation and business partners

Our clients are key to our success. They always should be treated fairly and openly and receive advice and support in compliance with the highest business standards.

6. Exclusion and non-association

Since Thonet has committed to observing a number of principles, representing ethical values and complying with standards, Thonet does not have business relations with companies that intentionally infringe these values. Our guiding principles comply with the principles of the UN Global Compact (attachment), the ILO Conventions, the UN General Declaration of Human Rights, the UN Convention on the Rights of Children and against discrimination, and the OECD Guidelines for Multinational Enterprises.

We avoid doing business with enterprises whose main products are landmines or weapons of mass destruction. We distance ourselves from business relations with enterprises that regularly come into conflict with the law due to disrespecting human rights, supporting slavery or compulsory labour, and the systematic application of child labour as a principle of their business model. Corresponding indications have to be provided to the management. If enterprises are known to regularly infringe environmental laws, or do great damage to the environment, or repeatedly have applied methods that damage the environment, this may also lead to termination of the business relations. Corresponding indications have to be provided to the management.

If Thonet receives knowledge about serious misconduct, the situation will be reported to the management, which will decide how to proceed. If there are indications that a change of conduct on behalf of the client/partner is unlikely in the short term, the business relations should be terminated.

7. Charity and sponsoring

Corporate donations, sponsoring and the commitment to charity events are permissible only within the appropriate legal framework. In the case of donations to organisations in the education, science, art and culture sectors, or to socially relevant projects, they have to be considered beneficent and charitable. Donations to political parties are allowed only if the management has given written consent. Receipts for donations have to be requested where possible.

8. Implementation, complaint mechanisms and reports about misconduct

Each employee will observe the rules and principles from this code of conduct and will behave in compliance with the provisions. The management and supervisors strive towards assuring that all employees they lead know this code of conduct and its content. Supervisors have a role model function in applying the principles and practice what they want implemented in their area of influence. All employees can ask supervisors for advice if the implementation of this code or other internal rules is unclear to them. All employees are requested to inform their supervisor or the management of deviations from this code of conduct, especially of cases of fraud, corruption, infringements on competition law, accounting fraud or other actions that are adequate for prosecution or represent a breach of applicable laws. The information will then be treated as strictly confidential and used for close investigation of the case and the initiation of the necessary and appropriate corrections. In serious cases, internal actions may be taken or the state attorney's office may be informed in order to prevent damage to the company. An employee reporting about misconduct or infringements on the code of conduct may not suffer any disadvantages – unless there is evidence that the investigations were misguided intentionally or with evil intent. In addition to the fact that any misconduct could damage the reputation of Thonet, an infringement of the code of conduct may result in disciplinary or legal actions that lead to financial and other sanctions.

9. Final remarks

This code of conduct is applicable for Thonet. National or regionally specific regulations that do not contradict those mentioned in this code of conduct are permissible and supported. The progress with the implementation of the code of conduct is monitored. Changes are possible at any time. Thonet is at liberty to introduce further codes of conduct with higher standards to ethical conduct for itself and its employees.

ANNEX

United Nations Global Compact

The principles of the Global Compact are based on an international consensus which is derived from the

- Universal Declaration of Human Rights
- International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- Rio Declaration on Environment and Development, and the
- United Nations Convention Against Corruption.

The Global Compact requires companies to accept, support and implement a catalogue of basic values – human rights, labour standards, environmental protection and anti-corruption – within their sphere of influence:

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.