

Code of Conduct for suppliers to the Fielmann Group

Dear Sir/Madam,

Fielmann AG is the market leader in Germany's optical industry and stands for strict customer orientation, outstanding quality and fashionable eyewear at the best prices. 90% of all people living in Germany have heard of Fielmann. 25 million people wear a pair of glasses from Fielmann. In Germany, the company sells half of all glasses on the market.

As the market leader, Fielmann assumes responsibility for its customers, its employees and for society as a whole. Being committed to the common good is a matter of course for Fielmann, because investments in the community are investments in the future. Beginning with the 2017 financial year, Fielmann publishes a Sustainability Report in addition to the Annual Report and discloses the main features of its compliance system.

Fielmann respects law and order, both locally and internationally. We also demand the same of our employees and our business partners. Mistakes made by individuals can cause enormous economic damage. The loss of trust that accompanies legal infringements is even more serious. Our company is characterized by the mutual trust and shared responsibility of all our employees, by the protection of nature and natural resources, and by our behaviour in business life.

Fielmann has drawn up a binding "Code of Conduct" for suppliers. Our code is based on the recognized principles of the UN Global Compact and contains a catalogue of basic values that must be recognized, actively supported and implemented in order to establish a long-lasting, sustainable working relationship. These basic values apply equally to all Group companies belonging to Fielmann AG.

In order to guarantee the high standards of our products and meet customer expectations over the long term, this code must be fully observed and implemented throughout our entire supply chain. For this reason, we oblige our suppliers to comply with the code.

Please send the signed original copy of the attached supplier's pledge by _____ to your contact person in the purchasing department. This person will also be happy to answer any questions you may have.

Fielmann AG
The Management Board

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Compliance with the laws

The supplier hereby pledges to comply with the laws of the respectively applicable legal system(s).

Prohibition of corruption and bribery

The supplier hereby pledges not to tolerate corruption. It assures that it shall strictly comply with the relevant anti-corruption laws. Furthermore, it confirms that its company shall comply with the conventions of the United Nations (UN) and of the Organisation for Economic Co-operation and Development (OECD) for fighting corruption and with the relevant anti-corruption laws. In particular, the supplier ensures that its employees, subcontractors or representatives shall not offer, promise or grant the employees of Fielmann AG or affiliated third parties any benefits that aim to procure a work order or other form of preferential treatment in its business transactions.

Invitations and gifts

The supplier hereby pledges not to misuse invitations and gifts for the purpose of acquiring influence. Invitations and gifts shall only be granted to employees or their affiliates if the occasion and scope are appropriate, i.e. if they are of minimal value and can be regarded as an expression of locally recognized business practices. Similarly, the supplier shall not demand any inappropriate advantages from employees of the Fielmann Group.

Respect for the basic rights of employees

The supplier hereby pledges:

- to promote equal opportunities and equal treatment of its employees without regard to their race, ethnic background, gender, religion or ideology, disability, age or sexual identity.
- to respect every individual's personal dignity, privacy and personality rights.
- not to permit any forced labour in its company or to tolerate it among its own suppliers.
- not to tolerate any unacceptable treatment of workers, such as psychological cruelty, sexual and personal harassment, or discrimination.
- not to tolerate any behaviour (including gestures, language and physical contact) that is sexually coercive, threatening, abusive or exploitative.
- to ensure appropriate remuneration and to guarantee the legally stipulated national minimum wage.

- to comply with the legally stipulated maximum working hours in the respective country.
- to recognize the core labour standards of the International Labour Organization (ILO) under consideration of the applicable laws and legal forms in the various countries and locations.
- to recognize, as far as legally permitted, employees' freedom of association and to neither favour nor discriminate against members of employee organizations or trade unions.

Prohibition of child labour

The supplier hereby pledges to forbid and refrain from all forms of child labour in its company.

Health and occupational safety

The supplier hereby pledges to comply with nationally applicable laws on health and occupational safety. Furthermore, it shall be responsible for minimizing risks and ensuring the best possible precautions to prevent accidents and work-related illnesses. The supplier shall be required to establish and apply an appropriate form of occupational safety management.

Environmental protection and energy efficiency

The supplier hereby pledges to observe environmental protection and energy efficiency with regard to the legal norms and international standards, to minimize damage to the environment and to continuously improve environmental protection.

Money laundering and free competition

The supplier hereby pledges to comply with the legal obligations to prevent money laundering and not to take part in any activities that involve money laundering. Furthermore, it pledges to act fairly in competition and to respect the applicable antitrust laws.

Suppliers

The supplier hereby pledges to insist upon the compliance with the content of the Code of Conduct from its own suppliers and subcontractors, and to comply with these basic principles when selecting and working with its suppliers.

Compliance with the Code of Conduct

All infringements against the basic principles and requirements of Fielmann AG's Code of Conduct shall be regarded as a significant impairment to the contractual relationship. Upon suspicion of non-compliance with the outlined basic principles and requirements of the Code of Conduct (e.g. negative media reports), Fielmann AG shall reserve the right to demand information on the respective circumstances. If an infringement is established, Fielmann AG shall be entitled to terminate without notice individual or all contractual relations with suppliers who have been proven to infringe against or not to fulfil the Code of Conduct.

Hamburg, 13.11.2019

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Supplier's pledge

1. We have received a copy of the "Code of Conduct for suppliers to the Fielmann Group" (hereinafter referred to as the "Code of Conduct") in the version dated 13.11.2019 and hereby pledge to act in accordance with all the principles and rules contained/mentioned in the Code of Conduct, in addition to our obligations and agreements in our other contracts with companies in the Fielmann Group and also to oblige our employees as well as any suppliers or subcontractors that we engage to make the same commitment.
2. We confirm that we, as is also the case with Fielmann AG, understand the importance of the principles and rules contained/mentioned in the Code of Conduct as our duty when doing business with the Fielmann Group.
3. As part of the Code of Conduct, we shall provide Fielmann AG with information that is relevant to the Fielmann Group upon request and within an appropriate period of time.
4. We agree to allowing an internal or external auditor of the Fielmann Group or a third party appointed by Fielmann AG after consultation with us to undertake inspections in order to verify our compliance with the Code of Conduct.

Company name

Full address

Surname, first name of contact person

Position

Telephone number

E-mail address

Place, date

Signature & company stamp

Name of the signatory