

 Nachtmann A Division of Riedel Glassworks	Code of Conduct	Edition 4 dated November 13th, 2025
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***For ease of reading, the masculine form is used for personal designations and nouns relating to individuals in the following Code of Conduct. All terms apply equally to all genders.

Preamble

The Code of Conduct serves as a framework of orientation for all employees and business partners of Nachtmann GmbH. It combines the commitment to complying with laws and regulations with the requirements of ethical conduct. It sets expectations for Nachtmann GmbH itself while also representing a promise to the outside world. Binding legal standards may evolve, and therefore the Code of Conduct remains open to new norms of behavior. The rules of conduct must be observed. Misconduct will not be tolerated.

1. Compliance with Laws

Nachtmann GmbH complies with all applicable national and international laws and regulations, as well as any other relevant provisions. The standards that impose the strictest requirements must be applied.

2. Child Labor/Employment of Adolescent People

Nachtmann GmbH does not tolerate child labor or any form of exploitation of children and adolescent people. National laws and regulations protecting children and adolescent workers must be observed.

3. Forced Labor

Forced labor, compulsory labor, debt bondage, serfdom, or slave labor, as well as conditions resembling slavery, are not tolerated by Nachtmann GmbH. No employee may be directly or indirectly forced to work through violence and/or intimidation.

4. Discrimination

Any form of discrimination in hiring, employment, or compensation is prohibited. In particular any unequal treatment based on race, skin color, gender, age, religion, political opinion, membership in a workers' organization, physical or mental disability, ethnic, national or social origin, sexual orientation, or other personal characteristics is forbidden.

5. Working Hours

Working hours and break times comply with applicable law. According to the collective agreement, the weekly working time is 37.5 hours. Overtime must be voluntary, may not exceed 22.5 hours per week, and may not be required on a regular basis. Employees are entitled to at least two days off after seven consecutive working days. Overtime work is compensated separately.

6. Employment Contracts

Nachtmann GmbH concludes written employment contracts with its employees, specifying the employee's name, date of birth, home address, the start and duration of the employment relationship, and their wage.

 Nachtmann A Division of Riedel Glassworks	Code of Conduct	Edition 4 dated November 13th, 2025
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7. Compensation

Wages and salaries paid for regular working hours correspond at least to the statutory or collectively agreed minimum wage – whichever is higher. Salary deductions as disciplinary measures are prohibited.

8. Freedom of Association and Right to Collective Bargaining

Nachtmann GmbH recognize the right to establish, join, exit or work for unions or organizations of one's choice for the purpose of promoting and protecting employees' interests, in accordance with applicable laws and regulations. The employment must not be impaired thereby.

9. Disciplinary Measures

All employees must be treated with dignity and respect. Disciplinary measures may only be taken in accordance with applicable national and international law. No employee may be subjected to verbal, psychological, sexual, and/or physical abuse, coercion, or harassment.

10. Health and Safety

Nachtmann GmbH ensures a safe and healthy working environment in accordance with applicable laws and regulations. Necessary measures are taken to prevent accidents and health hazards related to work activities. Employees receive regular and documented health and safety training. This training is repeated for new or re-hired employees.

11. Environmental Protection

Responsible environmental management must be considered. National and international environmental regulations must be observed.

12. Bribery and Corruption

Nachtmann GmbH does not tolerate any form of bribery or corruption. Gifts that are customary and polite may only be accepted or given if they do not create any obligations and if applicable to the local laws. Employees are prohibited from accepting or granting gifts or benefits if:

- they consist of monetary gifts or non-market-standard discounts,
- acceptance of the benefit harms the company's business interests,
- the granting of the benefit is directly linked to the award of a contract,
- the benefit originates, directly or indirectly, from a party involved in a negotiation or bidding process,
- the value of the benefit exceeds what is socially appropriate and reasonable in the individual case.

13. Protection of Personal Information

Nachtmann GmbH considers it important to handle the personal information (information enabling personal identification) of employees and business partners appropriately and to protect their rights and interests. In accordance with applicable data protection regulations, Nachtmann GmbH ensures the proper collection, storage, and use of such information.

 Nachtmann A Division of Riedel Glassworks	Code of Conduct	Edition 4 dated November 13th, 2025
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14. Respect for Intellectual Property Rights

Nachtmann GmbH ensures that the intellectual property of others is not infringed and acknowledges that intellectual property rights are essential corporate assets.

15. Free and Fair Trade

Nachtmann GmbH conducts free and fair trade and competition and complies with the applicable laws and regulations of the respective countries.

16. Commitment of Suppliers, Subtractors and Representative or Agent of the Supplier

Nachtmann GmbH requires its suppliers to obligate their own sub-suppliers to a Code of Conduct that meets at least the requirements of this Code of Conduct, in order to ensure seamless compliance throughout the supply chain (see Code of Conduct for Nachtmann Suppliers).

Neustadt, November 13th, 2025

Nachtmann GmbH

Nachtmann GmbH

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Richard Voit

CEO