

ETHICAL DUE DILIGENCE PROCEDURE

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PREFACE

PROLICHT enters into numerous relationships with suppliers in its daily business activities. In doing so, upholding PROLICHT's values, as expressed in our Code of Ethics and Conduct, is of particular importance to us in order to ensure PROLICHT's business integrity. PROLICHT has a zero tolerance policy towards fraud, corruption, money laundering, environmentally harmful behavior, human rights violations, and anti-competitive practices aimed at unfair competition. For this reason, PROLICHT only considers suppliers who act according to similar ethical standards as PROLICHT.

1 DUE DILIGENCE PROCEDURE AT PROLICHT

Suppliers of PROLICHT are selected in a fair and transparent process. The evaluation of potential suppliers is carried out on the basis of the present Ethical Due Diligence procedure.

Existing suppliers are also regularly reviewed for compliance as part of the Ethical Due Diligence process.

The review of potential and existing suppliers at PROLICHT proceeds according to the following steps:

1.1 IDENTIFICATION OF THE SUPPLIER

Potential suppliers first fill out the supplier self-disclosure (see point 2) and thus provide information about their integrity and business ethical standards.

With the help of the supplier self-disclosure, PROLICHT obtains basic information about the respective company, such as a possible affiliation to a group or existing ISO certifications. Furthermore, this questionnaire can be used to determine which measures the supplier takes with regard to the environment and sustainability, as well as in the areas of ethics and information security.

1.2 INTERNAL ASSESSMENT OF THE SUPPLIER

Internally, a review of potential and existing suppliers is carried out using international sanctions lists, watch lists from supervisory authorities, PEP lists and negative media reports relating to the respective supplier or employees of the supplier concerned. This internal review is based on the internal supplier checklist.

1.3 RISK ASSESSMENT

The final risk assessment is based on an analysis of the information obtained about the potential or existing supplier using predefined red flags.

If no red flags are uncovered, nothing stands in the way of cooperation with the respective supplier from the compliance side. However, if any red flags are found, further clarification is required or cooperation with the respective supplier is discontinued.

A "Red Flag" is a warning sign that serves to indicate a possible problem. The definition of the "Red Flags" relevant for PROLICHT can be found in section 1.3.1

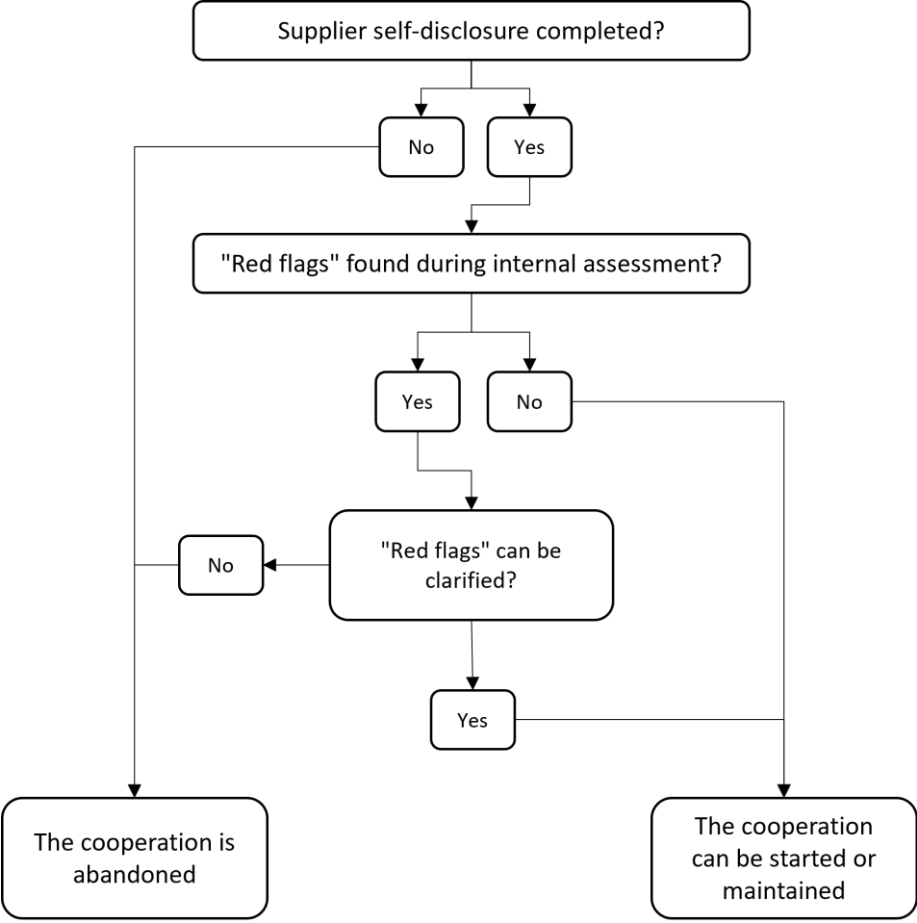


Figure 1: GRAPHICAL PRESENTATION DUE DILIGENCE PROCEDURE AT PROLICHT

1.3.1 RED FLAGS

A “Red Flag” is a warning sign that is used to indicate a potential problem.

For PROLICHT, the following are considered as “Red Flags”:

- Failure to comply with sanctions and embargos
- Lack of environmental protection measures (waste, energy consumption, CO2 emissions, sustainable procurement)
- No code of ethics and conduct in existence of the part of the potential supplier
- Charges, convictions or allegations related to the commission of crimes such as fraud, corruption, money laundering, cartelization, price fixing, tax evasion
- Non-standard payment methods or non-transparent business transactions (transfer to so called “tax heavens”)
- Sanctions as a result of violations of export law
- Connections of the potential supplier to PEP (political exposed person)
- Violation of basic human rights
- No cooperation in the due diligence process on the part of the potential supplier
- Other risks that could damage PROLICHT’s reputation

2 SUPPLIER SELF DISCLOSURE

Before entering a business relationship with a potential supplier, a written agreement based on the supplier self-disclosure must be executed and signed by the potential supplier.

The responsible employee of PROLICHT ensures that the supplier self-disclosure, as well as all other related documents, are filed in accordance with the applicable document retention guidelines and the data protection policy of PROLICHT.

The complete supplier self-disclosure can be found in the appendix (see A1).

3 INTERNAL SUPPLIER CHECKLIST

As described above, the internal supplier checklist is used to analyze the risk for PROLICHT arising from the cooperation with a specific supplier. In addition to the information from the supplier self-disclosure, the risk assessment also includes information from sanctions lists and watch lists of supervisory authorities, PEP lists and Internet research.

The internal supplier checklist can be found in the appendix (see A2).

4 APPENDIX

A1 LIEFERANTENSELBSTAUSKUNFT	A1
A2 INTERNE LIEFERANTEN CHECKLISTE	A5

SUPPLIER SELF-DISCLOSURE

PROLICHT GmbH | Gewerbepark 9 | 6091 Götzens

INFORMATION ABOUT YOUR COMPANY

Company name	
Street	
Zip code, city	
Country	
Phone	
Fax	
Website	
Legal form	
Company language	
Turnover of the last year in EURO	
Number of employees	
Production sites	
If part of a group, name and registered office of parent company	
Company foundation	
Company vacations	
Sales tax identification number	
Existing ISO certifications	

PAYMENT TRANSACTIONS

Currency	
Bank details	
BIC	
IBAN	
Terms of payment	

ORDER HANDLING

Please always send all relevant emails regarding order handling to purchasing@prolicht.at.
Thank you!

CONTACT PERSONS	NAME	PHONE	E-MAIL-ADDRESS
Management			
Sales			
Purchasing			
Construction			
Production			
Logistic			
Quality management			

Do you agree to sign a non-disclosure agreement?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are you able to issue a long-term supplier declaration according to the latest status of the Chamber of Commerce at the beginning of the business relationship?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are you able to issue a current long-term supplier declaration every year?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Can our order number be printed on your business papers (order confirmation/delivery note/invoice)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Can the PROLICHT article number be printed on your business papers (order confirmation/ delivery note/invoice)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have the possibility to document additional remarks on your business papers (e.g., commission, project name, hand to, etc.)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have the possibility to create a quotation within 48 hours after request?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have the possibility to send an order confirmation within 48 hours after receiving the order?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have the possibility to print the country of origin and the customs tariff number on your business documents (order confirmation/delivery note/invoice)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have the possibility to send us an overview of your existing assortment, in which it can be identified which country of origin and which customs tariff number apply?	<input type="checkbox"/> Yes <input type="checkbox"/> No

SHIPPING AND PACKAGING

Is it possible for your company to attach the delivery bill to the delivery in a clearly visible way?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Can the following maximum packaging dimensions for profiles be adhered to (Height max. 0.65m/Width max. 0.68m/Length max. 6.4m)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Can the following maximum dimensions for pallets be adhered to? (Height max. 1.5m/Width max. 0.8m/Length max. 1.2m)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have the possibility to organize the shipment yourself with your standard carrier?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have the possibility to register the shipment with our carrier if we provide you with the contact details?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have the possibility to inform us one day before the dispatch for larger shipments (10 pallets or more)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does your packaging have a certificate according to FSC standard (Forest Stewardship Council)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Can you confirm that the packaging material used has been correctly de-certified?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the packaging recycling-friendly?	<input type="checkbox"/> Yes <input type="checkbox"/> No

ENVIRONMENT AND SUSTAINABILITY

Do you have documentation on your energy consumption and annual energy consumption targets and optimizations that you can submit to us?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have documentation on your waste generation and targets for its optimization that you can provide us with?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have documents on your CO2 consumption and targets for their optimization that you can present to us?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you train and sensitize your employees in the area of environmentally relevant topics?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have guidelines for sustainable procurement and can you present them to us?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have sustainable procurement targets and are these continuously optimized?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have seals of approval for various areas of sustainable procurement / environmental management?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If the last question was answered with "Yes", please fill in the designation here.	
Do you have documents or plans for e-mobility available and can share them with us?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you offer incentives for your employees in the area of e-mobility?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you have the requested data available from your upstream suppliers?	<input type="checkbox"/> Yes <input type="checkbox"/> No

CODE OF ETHICS AND CONDUCT

Does your company have a code of ethics or conduct and can you share it with us?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are new employees trained on the code of ethics or conduct? If so, is there documentation on this?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Has your company had any investigations, charges or convictions for criminal, corrupt, unethical or illegal acts? (Including serious allegations by an NGO).	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>If the answer to the last question is "Yes," please provide information about the incident(s) here.</p> <p>Type of incident:</p> <input type="checkbox"/> Fraud <input type="checkbox"/> Money laundering <input type="checkbox"/> Corruption <input type="checkbox"/> Bribery <input type="checkbox"/> Tax evasion <input type="checkbox"/> Cartelization <input type="checkbox"/> Price fixing <input type="checkbox"/> Failure to comply with sanctions or embargoes.	Explanation:
Does your company involve PEPs (politically exposed persons), family members of PEPs, or persons close to PEPs?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If the last question was answered with "Yes", please disclose here the names of the persons, their position in the company and the nature of their connection to PEP.	
Are there any individuals involved in your company who are public officials or members of a government organization?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If the answer to the last question is "Yes," please disclose here the names of the individuals, their position in the company, and the nature of their connection to the government organization.	
Does your company have a whistleblower reporting procedure? (Whistleblower reporting procedure in the company).	<input type="checkbox"/> Yes <input type="checkbox"/> No

INFORMATION SECURITY

Are information and data security measures (DSGVO) implemented in your company?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does your company have an information and data protection statement that you can share with us?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does your company have a data protection officer?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If you answered "Yes" to the last question, please provide the contact details of the data protection officer here.	

INTERNAL SUPPLIER CHECKLIST

OVERVIEW




Checked supplier (name/company)	
Date	
Person in charge	

Conclusion	Notes
<input type="checkbox"/> Red Flag(s) identified <input type="checkbox"/> Further review recommended <input type="checkbox"/> Further review by management <input type="checkbox"/> No Red Flag(s) identified	
Further procedure	

INFORMATION ABOUT THE SUPPLIER





Legal form	
VAT number	
(Company) address	
Contact person	Name: Phone: E-Mail:
Branch(es)	
Management	
Group affiliation	<input type="checkbox"/> Yes <input type="checkbox"/> No Group:
ISO certifications	




CHECK APPLICABLE ITEMS


1. ACCESS TO INFORMATION		
	<input type="checkbox"/>	Supplier self-disclosure not completed and signed.
	<input type="checkbox"/>	Missing proof of registration or actual existence of the supplier.
	<input type="checkbox"/>	Anomalies in relation to the payment process? Remark:
	<input type="checkbox"/>	Supplier is on a sanctions list/watch list. Remark:
	<input type="checkbox"/>	Non-disclosure agreement not signed.
	<input type="checkbox"/>	No long-term supplier declaration according to the latest status of the Chamber of Commerce.
	<input type="checkbox"/>	PROLICHT order number cannot be printed on business papers.
	<input type="checkbox"/>	PROLICHT article number cannot be printed on business papers.


<input type="checkbox"/>	Offer can not be sent within 48 hours after request.
<input type="checkbox"/>	Order confirmation cannot be sent within 48 hours after order.
<input type="checkbox"/>	Country of origin and customs tariff number cannot be printed on business papers.
Rem.:	




2. SHIPPING AND PACKAGING	
<input type="checkbox"/>	Delivery bill cannot be attached to the delivery in a clearly visible manner.
<input type="checkbox"/>	Maximum packaging dimensions for profiles cannot be adhered to (height max. 1.5m/width max. 0.8m/length max. 1.2m).
<input type="checkbox"/>	Dimensions for pallets cannot be kept (height max. 1,5m/width max. 0,8m/length max. 1,2m).
<input type="checkbox"/>	Shipping cannot be organized by supplier (standard forwarder)
<input type="checkbox"/>	Supplier cannot register shipment via our forwarding agent.
<input type="checkbox"/>	Advance information for larger shipments not possible (1 day before delivery for > 10 pallets).
<input type="checkbox"/>	No FSC certificate for packaging.
<input type="checkbox"/>	No confirmation whether packaging material has been correctly de-commissioned.
<input type="checkbox"/>	Packaging is not recycling friendly.
Rem.:	

3. ENVIRONMENT AND SUSTAINABILITY	
	<input type="checkbox"/> No documentation submitted on energy consumption/targets for optimization.
	<input type="checkbox"/> No documentation submitted on waste generation/targets for optimization.
	<input type="checkbox"/> No documentation submitted on CO2 consumption/targets for optimization.
<input type="checkbox"/>	No training of employees on environmentally relevant topics.
	<input type="checkbox"/> No guideline for sustainable procurement submitted.
<input type="checkbox"/>	No quality seals for various areas of sustainable procurement/environmental management submitted.
<input type="checkbox"/>	No plans submitted for e-mobility.
<input type="checkbox"/>	Requested data for upstream suppliers not available.
Rem.:	

4. CODE OF ETHICS AND CONDUCT	
	<input type="checkbox"/> No code of ethics and conduct presented.
<input type="checkbox"/>	No training of employees on the Code of Ethics and Conduct.
	<input type="checkbox"/> Investigations, charges or convictions for criminal, corrupt, unethical or illegal acts. Remark:
	<input type="checkbox"/> PEP (politically exposed persons) involved? Remark:

	<input type="checkbox"/>	Officials or members of a government organization involved? Remark:
	<input type="checkbox"/>	No whistleblower reporting procedure.
Rem.:		

5. INFORMATION SECURITY		
	<input type="checkbox"/>	No data and information security measures.
	<input type="checkbox"/>	No declaration of data and information security submitted.
	<input type="checkbox"/>	No data protection officer in the company.
Rem.:		

6. REPUTATION IN THE MEDIA		
	<input type="checkbox"/>	Negative information/news about the supplier
	<input type="checkbox"/>	Negative information/news about shareholders
	<input type="checkbox"/>	Negative information/news about the management
Remark		
Research carried out on		

_____ , on _____
 (Site) (Date)

 Signature of person in charge