

Slavery and human trafficking statement

Introduction

This statement is made pursuant to Sect. 54 (1) of the UK Modern Slavery Act 2015 (UKMSA) and sets out the steps that LEDVANCE has taken and is continuing to take to ensure that modern slavery or human trafficking is not occurring within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. LEDVANCE has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any of these practices.

Our business

LEDVANCE is one of the world's leaders in general lighting for lighting professionals as well as end users, offering a broad variety of LED luminaires, advanced LED lamps, intelligent Smart Home & Smart Building solutions as well as traditional light sources.

Emerged from the general lighting business of OSRAM, the company is now owned by Chinese lighting company MLS Co., LTD. With offices in more than 50 countries and business activities in more than 140 countries, LEDVANCE possesses an outstanding global market access built on trusted, long-standing customer relationships and a powerful distribution network. Based on our in-depth understanding of the general lighting market, trending technologies, and changing needs, we support the specific and individual demands of both direct and indirect customers.

At all of its locations around the world, LEDVANCE is committed to acting responsibly towards its customers, employees, business partners, society, and the environment.

LEDVANCE's UK operations report to our Head Office Ledvance GmbH in Garching, Germany.¹

Our policies

We operate several internal policies to ensure that we are eliminating risks and conducting business in an ethical and transparent manner. These include:

1. **Anti-slavery policy.** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. **Recruitment policy.** We operate a robust recruitment policy, including conducting "eligibility to work" checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. **Whistleblowing policy.** We operate a whistleblowing policy and hotline so that employees or external third parties can raise concerns about how employees are being treated or inform about practices within our business or supply chain, without fear of reprisals.
4. **Code of Conduct.** This code explains the way we behave as an organisation and how we expect our employees and suppliers to act.
5. **Compliance** is an integral part of our business processes. Our Compliance system is based on the three pillars: Prevent, Detect and Respond.
6. Our **Corporate responsibility** for sustainable development is an integral part of our strategy. From an organisational point of view, the cross-discipline subject of sustainability is directly linked to the Management Committee via our Head of Compliance & Sustainability.

¹ Products for sale in the UK and Ireland are produced in China, distribution is through our Distribution Centre in France.



In addition, we are a signatory of the UN Global Compact: <https://unglobalcompact.org/what-is-gc/participants/123121> and a full member at amfori: <https://www.amfori.org/>.

Sustainability in the supply chain

Sustainability plays an important role in the supply chain as part of a global economy. We expect our suppliers to adhere to basic values in human rights, labour standards, environmental protection, and the fight against corruption, among others. To ensure this, we hold intensive discussions with our suppliers to create a common understanding of basic values. In addition, we use tools and processes to support our suppliers as implementation partners and to verify compliance:

- Corporate Social Responsibility (CSR) is an obligatory element for suppliers, and implementing these measures is part of the “balanced scorecard” of our purchasers.
- Our supplier qualification process requires submission of supplier self-disclosures of relevant data on CSR criteria.
- Based on self-disclosure and other risk-based criteria, CSR supplier audits are conducted by objective external auditors.
- Regular audits are necessary to verify compliance with the “Code of Conduct for LEDVANCE Suppliers”, and we extended our regular supplier audits to include multiple aspects of corporate responsibility.

Integration of these tools in our central purchasing system ensures seamless incorporation in the entire procurement process. If discrepancies are found during supplier auditing, we discuss these with the supplier and together produce proposals for improvement. The relevant supplier is then re-audited. No violations of our Code of Conduct for suppliers have yet been discovered that would necessitate terminating a business relationship, and the general feedback from our suppliers has been positive.

Due Diligence in the supply chain

LEDVANCE operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that the supplier has never been convicted of offenses relating to modern slavery, and occasionally on-site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers, and they are required to confirm that no part of their business operations contradicts this policy.²

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Effectiveness performance indicator

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is taking place within our business or supply chain if:

- No reports have been received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

² Suppliers must complete and re-submit the “Code of Conduct for LEDVANCE Suppliers” form.



Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Approval for this statement

This statement was approved by the LEDVANCE Management Committee on March 17th, 2023, and signed by one of its members, our Chief Operations Officer.

Name: Gareth Jackson

Date: 23/3/23

Signature: I.V. A handwritten signature in blue ink, appearing to be "I.V." followed by a stylized, cursive signature.