



April 2024

The following are Lutron's responses to each key point described in The California Transparency in Supply Chains Act of 2010.

**I. Engages in the verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party.**

Lutron's supply chain personnel routinely conduct on-site inspections of certain strategic suppliers. Suppliers are assessed on several factors, including human rights issues, such as a review for indicia of slavery, discrimination, human trafficking, child labor, payment of fair wages, and adherence to Lutron's applicable [Standard Terms and Conditions](#) and Lutron's [Supplier Code of Conduct](#). Verification is conducted by employees of Lutron and its affiliated companies. Generally, these inspections are announced and conducted by Lutron's supply chain personnel.

**II. Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit.**

Lutron performs periodic on-site audits of strategic suppliers, including monitoring the supplier's adherence to Lutron's [Standard Terms and Conditions of Purchase](#) and Lutron's [Supplier Code of Conduct](#). In addition, Lutron performs audits of new suppliers to evaluate the risk and fit of these suppliers. Metrics of the audits include a review for indicia of slavery, discrimination, human trafficking, child labor, and payment of fair wages. Generally, these audits are announced and conducted by Lutron's supply chain personnel.

**III. Conducts due diligence on suppliers.**

Lutron utilizes industry recognized tools to conduct due diligence and continuous monitoring of suppliers for compliance with applicable laws and regulations, including, but not limited to labor practices, environmental regulations, bribery and corruption, immigration, and occupational safety and health.

**IV. Requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.**

Under Lutron's [Standard Terms and Conditions of Purchase](#), the Seller warrants that all goods provided under a Purchase Order have been produced and all services performed in compliance

with applicable federal, state and local laws, ordinances, codes, rules, regulations, or standards, including without limitation, the Fair Labor Standards Act, and those pertaining to the manufacture, labeling, invoicing and sale of such goods or services, environmental protection, immigration, employment and occupational safety and health.

In addition, Lutron requires its suppliers to adhere to its [Supplier Code of Conduct](#), which reflects our expectation for all suppliers to act with integrity in all business relationships and demonstrate a commitment toward effective controls to ensure slavery and human trafficking are not taking place. Specifically, the [Supplier Code of Conduct](#) requires all suppliers to comply with all applicable laws, codes, and regulations of the countries, states, and localities in which they operate, including child labor, minimum wages, forced labor, discrimination, and anti-slavery/human trafficking.

**V. Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.**

Lutron employees are required to strictly observe all applicable laws and regulatory requirements, including those relating to slavery and human trafficking. We maintain internal accountability standards and procedures applicable to employees and contractors and hold those who fail to meet company standards accountable. Employees who violate Lutron's Code of Conduct, or any other company policy or procedure, are subject to disciplinary action that management considers appropriate based on the nature of the violation, up to and including termination of employment in severe cases.

If compliance issues are discovered with a supplier, a plan of action is put into place to bring that supplier into compliance. Violations may result in the termination of the supplier's contract.

**VI. Provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.**

To ensure a continuous level of understanding of the possibility of modern slavery and human trafficking in Lutron's supply chains and business operations, Lutron provides training to employees, including management, responsible for product supply chain management on how to identify and respond to supply chain issues, such as human trafficking and slavery.

Lutron also maintains a Code of Conduct that outlines Lutron's expectations for all employees to adhere to the highest standards of conduct, and conducting business ethically, with honesty and integrity, and for complying with all applicable laws and regulations. Lutron also maintains an employee Ethicsline, where employees can raise questions or report concerns by name or anonymously.