



ANTI-SLAVERY AND HUMAN TRAFFICKING POSITION STATEMENT (FY 2022)

This statement is made by Lutron Electronics Co., Inc. and Lutron EA Limited (“Lutron EA”) (collectively, “Lutron”) pursuant to the California Transparency in Supply Chains Act of 2010 and section 54(1) of the UK Modern Slavery Act of 2015. Lutron is committed to fully complying with all applicable international human rights standards, labor and employment laws, rules, and regulations, and makes every effort to mitigate the risks of modern slavery and human trafficking in our business operations and supply chains. Lutron will not tolerate the use of slavery or human trafficking in any part of its business or supply chain.

This statement constitutes Lutron’s anti-slavery and human trafficking position statement for the financial year ending on 31 December 2022 and sets out the steps that we have taken and are taking to ensure that slavery and human trafficking are not taking place in our supply chain or any part of our global business operations.

About Lutron

Lutron Electronics Co., Inc. is a global manufacturer of lighting control devices and window shading systems headquartered in Coopersburg, Pennsylvania, USA. Lutron Electronics Co., Inc. is the parent company of Lutron EA Limited, a private limited company registered in England and Wales (Company No: 01925140) and whose registered offices are at 125 Finsbury Pavement, London EC2A 1NQ. Lutron EA Limited is a distributor of Lutron lighting controls and window shades in the UK and Europe.

The entire Lutron organization operates under five principles and philosophies:

- I. Take care of the customer with superior goods and services;
- II. Take care of the company;
- III. Take care of the people;
- IV. Innovate with high-quality products; and
- V. Deliver value to the customers.

Lutron products save energy by reducing electrical consumption.

Our Supply Chains

The vast majority of electrical components are sourced from distributors that are large publicly traded multinational companies, though certain small-to-mid-sized and privately held manufacturers supply Lutron with components. Lutron has determined that the most significant risk of slavery and human trafficking—to the extent it may exist in its supply chain similar to any other similarly-situated global manufacturer of electronic and electrical components—is in India, China, and various parts of South East Asia

Policies on Slavery and Human Trafficking

Lutron has policies and procedures in place relevant to preventing modern slavery, which are periodically reviewed and updated.

1. Supplier Code of Conduct

Lutron’s [Supplier Code of Conduct](#) 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 the following labor practices:

- **Child Labor**

Lutron will not engage in or support the use of child labor. Suppliers are expected to comply with all applicable local child labor laws and only employ workers that meet the applicable minimum legal age requirement(s) for their location.

- **Minimum Wages**

Suppliers shall provide wages for regular and overtime work and benefits that meet or exceed legal requirements.

- **Forced Labor**

Suppliers shall not use any forced, prison, or indentured labor. Lutron will not engage in or support the use of forced or involuntary labor, and as a result, Lutron will not purchase material or services from a supplier utilizing forced or involuntary labor.

- **Discrimination**

Lutron supports diversity and equal opportunity in employment. Unlawful discrimination in the workplace is not tolerated. Suppliers are expected to comply with all applicable local laws concerning discrimination in hiring and employment practices.

- **Anti-Slavery/Human Trafficking**

Lutron will not tolerate the use of slavery or human trafficking in any part of its business or supply chain and expects its suppliers to take steps to ensure it is not taking place in their business or supply chains. We expect all suppliers to have effective controls to ensure slavery and human trafficking in any form do not occur in their supply chains.

2. Conflict Minerals originating from the Democratic Republic of Congo

Lutron supports ending the violence and human rights violations, including forced and child labor, that are associated with the mining of certain minerals in the Democratic Republic of Congo and surrounding countries. More details on Lutron's commitment can be found in our [Conflict Minerals Policy](#).

3. UK Modern Slavery Act of 2015 & California (USA) Transparency in Supply Chains position statements

Lutron publicly posts on both its USA ([Lutron's Anti-Slavery and Human Trafficking Annual Position Statement – US](#)) and UK/European ([Lutron's Anti-Slavery and Human Trafficking Annual Position Statement – UK](#)) websites the steps it has taken in its supply chain to ensure slavery and human trafficking are not taking place in its supply chain or any part of its business.

Due Diligence Processes for Slavery and Human Trafficking

To assess, manage, and mitigate such potential risk, Lutron has due diligence processes and training programs in place. In addition, Lutron relies on our suppliers' respective Anti-Slavery and Human Trafficking statements and other compliance declarations, as endorsed by their executive teams. Lutron routinely sends out compliance audit questionnaires to its suppliers located in jurisdictions that Lutron considers "high risk" as part of its overall strategic risk assessment.

1. Sourcing from reputable suppliers.

Lutron strives to source materials from those suppliers who have demonstrated a history of supplying acceptable products and value-added service, as evidenced by the number of years in business, customers' opinions, financial stability, and past audit results. Lutron routinely sends out

compliance audit questionnaires to its suppliers located in jurisdictions that Lutron considers “high risk” as part of its overall strategic risk assessment.

2. Sourcing from suppliers adopting the Responsible Business Alliance’s (RBA) Code of Conduct.

Lutron sources select components from suppliers that participate in third-party verification programs and/or have adopted the RBA’s (f/k/a Electronic Industry Citizenship Coalition) [Code of Conduct](#).

3. Sourcing from suppliers participating in the Responsible Minerals Initiative (RMI).

The solder used in Lutron’s manufacturing process is purchased from suppliers that participate in the RMI’s Responsible Minerals Assurance Process ([RMAP](#)).

4. Requiring suppliers to comply with local laws.

Lutron’s [Standard Terms and Conditions](#) and [Supplier Code of Conduct](#) are incorporated into supply agreements and purchase orders with direct suppliers. This requires direct suppliers to warrant that all goods provided under purchase orders have been produced, and all services have been performed, in compliance with all applicable laws, ordinances, codes, rules, regulations, and standards, including those pertaining to the manufacture, labeling, invoicing and sale of such goods or services, environmental protection, immigration, employment, and occupational safety and health.

5. Conducting on-site inspections of certain strategic suppliers.

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 audits are announced and conducted by Lutron’s supply chain personnel.

Staff Training

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 group employees responsible for product supply chain management on how to identify and respond to supply chain issues, such as human trafficking and slavery.



Walter S. Peake
Director, Lutron EA Limited