



## **ANTI-SLAVERY, HUMAN TRAFFICKING, AND FORCED AND CHILD LABOR POSITION STATEMENT (FY 2024)**

This statement is made by Lutron Electronics Canada Inc. ("Lutron") pursuant to Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada). Lutron is committed to fully complying with all applicable international human rights standards, labor, and employment laws (including forced and child labor), rules, and regulations, and makes every effort to mitigate the risks of modern slavery, human trafficking, and forced and child labor, in our business operations and supply chains. Lutron will not tolerate the use of slavery, human trafficking, or forced and child labor in any part of its business or supply chain.

This statement constitutes Lutron's anti-slavery, human trafficking, and forced and child labor position statement for the financial year ending on 31 December 2023 and sets out the steps that we have taken and are taking to prevent the use of slavery, human trafficking, and forced and child labor in our supply chain or any part of our global business operations.

### **About Lutron**

Lutron Electronics Canada Inc. is incorporated under the Business Corporations Act (Business No. BC0919645) with registered offices located at 1200 Waterfront Centre, 200 Burrard Street, Vancouver, BC V6C 2L6. Lutron Electronics Canada Inc. is a subsidiary of Lutron EA Limited. Lutron EA Limited is a private limited company registered in England and Wales (Company No: 01925140) and whose registered offices are located at 51 Lime Street, 3<sup>rd</sup> Floor, London EC3M 7DQ. Lutron EA Limited is a subsidiary of Lutron Electronics Co., Inc., a global manufacturer of lighting control devices and window shading systems headquartered in Coopersburg, Pennsylvania, USA and incorporated under the Business Corporation Law Act of May 5, 1933. Lutron Electronics Canada Inc. is a distributor of Lutron lighting controls and window shades in Canada.

Lutron products save energy by reducing electrical consumption.

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 has a written Code of Conduct, which applies to all our employees, executives, officers, and directors and seeks, among other things, to promote socially responsible conduct, integrity, and corporate responsibility.

### **Our Supply Chains**

The vast majority of electrical components are sourced from distributors that are large publicly traded multi-national companies, though certain small-to-mid-sized and privately held manufacturers supply Lutron with components.

### **Assessing and Managing Risk**

Lutron has conducted an assessment of the risk that forced labor or child labor exist in its activities and supply chains. This risk assessment takes into account the location of Lutron's activities, operations or factories, the types of products it sources, the raw materials or commodities used in Lutron's supply chains, and its tier two and three suppliers.

Lutron has determined that the most significant risk of slavery, human trafficking, and forced and child labor—to the extent it may exist in its supply chain—is in India, China, and various parts of South East Asia. These risks are generally related to mining and manufacturing activities. Lutron recognizes that conflict minerals and other sources of raw materials pose a risk of forced or child labor. Lutron has a multi-tiered supply chain and engages closely with its supply chain partners to minimize risk of forced or child labor occurring in its supply chain, using our Supplier Code of Conduct, Conflict Minerals Statement, conducting regular due diligence and supplier audits. Any supplier found to knowingly be using forced labor or child labor in any of its operations is reported and the business relationship is terminated.

## **Policies on Slavery and Human Trafficking**

Lutron has policies and procedures in place relevant to preventing modern slavery, human trafficking, and forced and child labor, 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 Statement](#).

## 3. Corporate Position Statements

Lutron publicly posts annual statements reflecting its position on Anti-Slavery and Human Trafficking, Forced and Child Labor, Supply Chain Transparency, and Conflict Minerals on its USA, Canada, and UK websites:

- United States:
  - [Lutron's Anti-Slavery, Human Trafficking, and Forced and Child Labor Annual Position Statement – US](#)
  - [California Transparency in Supply Chains Act](#)
  - [Conflict Minerals Statement](#)
- Canada
  - [Lutron's Anti-Slavery, Human Trafficking, and Forced and Child Labor Annual Position Statement – Canada](#)
  - [Conflict Minerals Statement](#)
- United Kingdom:
  - [Lutron's Anti-Slavery and Human Trafficking Annual Position Statement – UK](#)

## Due Diligence Processes for Slavery and Human Trafficking

To assess, manage, and mitigate the risk that modern slavery, human trafficking or forced or child labor are used in Lutron's operations or supply chain, 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 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.

### 3. 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.



#### **4. 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.

#### **5. Conducting 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, immigration, occupational safety and health, bribery, and corruption, etc.

### **Remediation Measures**

In the last financial year, we have not identified any incident of forced labor or child labor in our activities or supply chain. We therefore did not need to take any measures to remediate an incident of forced labor or child labor, nor did we need to take any measures to remediate the loss of income to the most vulnerable families resulting from remediation measures.

### **Staff Training**

To provide Lutron personnel with a continuous level of understanding of the possibility of modern slavery and human trafficking in Lutron's supply chains and business operations, Lutron provides mandatory 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.

### **Effectiveness**

Lutron regularly reviews and audits its policies and procedures related to forced labor and child labor.

### **Attestation**

This Statement was approved by a majority of the Officers of Lutron Electronics Canada, Inc. consistent with paragraph 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada), and in particular Section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material aspects for the purposes of the Act, and for the reporting year listed above. I have the authority to bind Lutron Electronics Canada, Inc.

Signature: 

Name: Walter S. Peake

Title: Director, Lutron Electronics Canada, Inc.

Date: March 24, 2025