

## **SUPPLIER CODE OF CONDUCT**

### **INTRODUCTION**

Lutron Electronics Co., Inc. is committed to conducting its business in an ethical, legal, environmentally, and socially responsible manner, including its procurement and supply chain practices.

Lutron's Supplier Code of Conduct ("Code") describes the standards and expectations we require of our suppliers. These requirements are consistent with the Principals and Standards of Ethical Supply Management Conduct published by the Institute for Supply Management.

Suppliers, their agents, and their subcontractors are expected to conduct business with integrity and mutual respect and to uphold the highest standards of ethical behavior. Suppliers shall take appropriate steps to ensure that the provisions of this Code are communicated and adhered to by their employees and throughout their own supply chain (including suppliers, agents, and subcontractors). Failure to comply with this Code may result in discontinuance of business relationships.

### **BUSINESS PRACTICES**

#### Business Integrity

Any and all forms of illegal or inappropriate activity, including but not limited to corruption, competition, misrepresentation, extortion, embezzlement, bribery, and money laundering are strictly prohibited by Lutron.

#### Company Resources and Information

Lutron expects our suppliers to properly handle confidential and proprietary information, such as business activities and relationships, strategies, plans, structure, technology, customers, financial situation, performance, and/or any other information that is shared. This information should not be used for any purpose other than the business purpose for which it was provided. We also expect our suppliers to respect and comply with all laws governing intellectual property rights, including protection against disclosure.

It is vital that our business partners safeguard Lutron's information and therefore suppliers must:

- comply with applicable non-disclosure agreements and contractual confidentiality requirements regarding information belonging to or in the possession of Lutron;
- never misuse or disclose confidential or proprietary information to unauthorized parties;
- properly handle Lutron's intellectual property, including the Lutron brand or logo; and
- receive Lutron's written approval before using information about Lutron or Lutron's name or brand identity in any marketing/advertising materials or website.

### Conflicts of Interest

Lutron requires that decisions made on its behalf be objective, fair, and avoid even the appearance of a conflict of interest. Suppliers should avoid engaging in any business activity that would conflict or interfere, or appear to conflict or interfere, with their provision of products and services to Lutron. In the event that an actual or potential conflict of interest arises, Suppliers shall notify Lutron immediately.

### Business Gratuities

Lutron's suppliers are expected to compete based on the merit of their products and services, not through gifts, entertainment, or other business gratuities. Although business courtesies can promote successful working relationships and good will, Lutron expects its suppliers to follow all applicable laws and Lutron's rules and procedures with respect to gifts, entertainment, and other business courtesies when working with or representing Lutron.

Any gifts, meals, or entertainment provided should be modest, infrequent, and not intended to influence business decisions. Lavish or extravagant gifts, including those of excessive monetary value, are strictly prohibited. As a general rule, Lutron suppliers may:

- Give or receive meals, gifts or entertainment only if it is considered reasonable and not be viewed as an inducement to or reward for any business decision;
- Accept or give advertising or promotional materials that contain the company's logo or name and are of nominal value;
- Give or receive holiday gifts of reasonable value; and
- Occasionally accept or give meals or other entertainment if the items are of reasonable value and the primary purpose of the meeting or event is business

related and representatives of Lutron and the supplier are both present. Frequent meals or events with the same supplier should be avoided.

Entertainment of reasonable value may include meals or tickets for sporting and cultural events if they are generally offered to others having a similar relationship with the supplier and are within the limits of responsible and customary business practices. However, in these instances, the supplier and Lutron should attend together.

Lutron should reciprocate a meal and/or entertainment received from a supplier with a meal and/or entertainment of similar value before receiving any other meals or entertainment from such supplier.

Suppliers should note that Lutron employees are prohibited from accepting individual items of excessive value, including cumulative amounts over a 12-month period. Additionally, any gift or entertainment offered may require approval or disclosure to a Lutron supervisor if an employee perceives it excessive or questionable.

#### Counterfeit Parts & Materials

Supplier must not use or provide counterfeit parts or materials under any circumstances and should develop, implement, and maintain methods and processes as they find appropriate to minimize the risk of introducing counterfeit parts and materials into deliverable goods to Lutron. If you suspect or become aware of any counterfeit parts or materials, you must notify us as soon as possible and take corrective action to prevent their use. Suppliers are also expected to comply with all applicable laws and regulations regarding the prohibition of counterfeit parts and materials.

### **COMPLIANCE WITH APPLICABLE LAWS, RULES, AND REGULATIONS**

All suppliers must comply with all applicable laws, codes, and regulations of the countries, states, and localities in which they operate. This includes, but is not limited to, laws and regulations relating to environmental, occupational health and safety, security, trade law compliance, labor practices, anti-bribery and corruption, competition laws, anti-money laundering, and data privacy and protection. In addition, Lutron suppliers must require their own suppliers to do the same.

## Bribery and Corruption

Lutron does not tolerate bribery in any form. Suppliers and those acting on their behalf may not offer or accept anything of that could, or appear to, secure any improper advantage. Any and all forms of illegal or inappropriate activity, including, but not limited to, corruption, misrepresentation, extortion, embezzlement, or bribery, are strictly prohibited and may result in termination of any or all supply agreements with Lutron Electronics Co., Inc. and possible legal action.

## Data Privacy

Lutron expects its suppliers to comply with all applicable data protection and privacy laws and ensure that any personal data provided by or related to Lutron or its employees, customers, agents, or representatives is obtained properly, stored securely, used only for those business purposes for which the data is obtained. Data obtained should only be kept for as long as it is needed. Suppliers acknowledge and will comply with rules regarding the transfer of personal data between certain countries. Suppliers must report any suspected or actual data breaches involving the exposure of Lutron's data – whether Lutron's employees or customers.

## Trade Laws

All suppliers must comply with applicable trade and sanctions laws and regulations. Lutron will not include in its supply chain any suppliers who do business with [OFAC's Specially Designated Nationals and Blocked Persons](#), or who directly or indirectly source or manufacture any materials, components, sub-components, or services for products from vendors or suppliers located in any [OFAC sanctioned country](#). Lutron additionally expects its suppliers to effectively screen its vendors and suppliers to determine if they are denied parties or are located in an OFAC sanctioned country.

## Labor Laws

Lutron suppliers must comply with all applicable laws and regulations relating to labor and employment laws, including the following:

### **1. 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 employ only workers who meet the applicable minimum legal age requirement for their location.

## **2. Minimum Wages**

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

## **3. Employment and Non-Discrimination**

Suppliers are expected to comply with all applicable local laws regarding employment practices, including, but not limited to Equal Opportunity, working hours, compensation, discrimination, harassment and retaliation.

## **4. Diversity and Inclusion**

Suppliers shall demonstrate a commitment to identify, measure, and improve a culture of diversity and inclusion through all aspects of their workplace.

## **5. 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 materials or services from a supplier utilizing forced or involuntary labor.

## **6. Anti-Slavery and 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. For more information, please refer to [Lutron's Anti-Slavery & Human Trafficking Annual Statements](#).

## **7. Conflict Minerals**

Lutron supports ending the violence and human rights violations, including forced and child labor, that are associated with the mining of certain minerals in high-risk conflict mineral (columbite-tantalite or tantalum/coltan, cobalt, gold, wolframite/tungsten, tin/cassiterite) locations, including the Democratic Republic of Congo (DRC) and surrounding countries (Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia). Suppliers are expected to determine the source of any tin, gold, tungsten, and tantalum in electrical components supplied to Lutron. Suppliers should also provide a completed Conflict Minerals Reporting Template (CMRT) that documents all the facilities that refine and smelt the tin,

tantalum, tungsten, and gold supplied to Lutron. For more information, please refer to [Lutron's Conflict Minerals Statement](#).

### Health and Safety

Suppliers must comply with all applicable health and safety laws and regulations in the countries in which they operate and have or subscribe to a written safety and health program. Suppliers are expected to provide a safe and healthy working environment for all employees, which includes implementing effective health and safety management systems, conducting regular risk assessments, and have emergency plans and response procedures in place. Suppliers must provide appropriate training, engineering and administrative controls, preventative maintenance, policies and procedures, and appropriate personal protective equipment, as well as any other relevant resources to prevent workplace injuries and illnesses.

### Environmental Practices & Sustainability

All Lutron suppliers shall comply with the environmental laws and regulations applicable to their operations worldwide. This includes proper handling and disposal of hazardous materials, reducing water and energy consumption, and preventing pollution.

Suppliers are expected to apply a continuous improvement approach to their environmental practices and reduce their environmental footprint. Such improvements may include, among other things, the following:

- Monitoring and reducing energy consumption and waste generated at their facilities
- Measuring and reducing Greenhouse Gas emissions at their facilities
- Producing products with healthy materials and/or recycled content where possible
- Reducing the amount of single-use plastic in product packaging and prioritizing sustainable materials whenever possible
- Reducing the amount of waste associated with product packaging

Lutron's customers may request information about the environmental performance of our supply chain. Suppliers are expected to respond to requests from Lutron to the best of their ability. In turn, Lutron will consolidate and streamline requests to suppliers whenever possible.