

LUTRON ELECTRONICS CO., INC.  
**SUPPLIER CODE OF CONDUCT**

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

Since 1961, Lutron Electronics Co., Inc. has been committed to conducting its procurement business in an ethical, legal, environmentally and socially responsible manner. Lutron is guided by its five principles: Take care of our Customer, Take care of our Company, Take Care of our People, Innovate with a High Standard of Quality, and Deliver Excellent Value to the Customer.

Lutron's commitment to the aforementioned business practices extends to its diverse and worldwide supply base. It is Lutron's expectation that all suppliers embrace and conform to this Code without delay. Suppliers are expected to be familiar with the business practices of their suppliers, agents, and subcontractors and ensure they operate within the guidelines of this Code. Failure to comply with this Code may result in discontinuance of business relationships. All Lutron suppliers must meet the following minimum requirements:

## **I. COMPLIANCE WITH LAWS, REGULATIONS, AND PUBLISHED STANDARDS**

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 (including, but not limited to, OFAC sanctioned-countries, Specially Designated Nationals, and Blocked Persons), labor practices (including, but not limited to, child or forced labor, anti-slavery/human trafficking, minimum wages, anti-discrimination, and conflict minerals), anti-money laundering, and data privacy and protection. In addition, Lutron suppliers must require their own suppliers to do the same.

## **II. ETHICS AND STANDARDS OF CONDUCT**

Suppliers, their agents, and their subcontractors are expected to conduct business with integrity and mutual respect and to uphold the highest standards of ethics and behavior, including:

### **1. Business Integrity**

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.

### **2. Company Information**

Confidential and proprietary information addressing matters such as Lutron's business activities, strategies, plans, structure, technology, customers, financial situation, and performance is critical to Lutron's success, and cannot be disclosed or used, except in accordance with applicable regulations, contractual requirements and this Code.

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 information regarding the Lutron brand or logo; and
- receive Lutron's written approval before using information about Lutron or Lutron's name or brand identity publicly in any publicity, advertising, or website.

### **3. Conflicts of Interest**

Suppliers should avoid engaging in any business activity that would conflict or interfere with their provision of products and services to Lutron.

### **4. 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.

Lutron believes that dealing with suppliers in a professional, ethical, and courteous manner is the primary way to build professional relationships. Lutron understands, however, that giving and receiving gifts is a common business practice and appropriate business gifts and entertainment are courtesies designed to further build professional relationships and understanding among business partners. Gifts and entertainment, however, should not compromise, or appear to compromise, the ability to make objective and fair business decisions. As a general rule, Lutron employees may give or receive gifts or entertainment to or from suppliers only if the gift or entertainment would not be viewed as an inducement to or reward for any particular business decision. Under no circumstances may Lutron employees give or accept a gift of cash, stocks, or bonds. All gifts and entertainment expenses must be properly accounted for on expense reports. The following are specific examples:

Meals and Entertainment. Lutron employees may occasionally accept or give meals, refreshments 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.

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. Lutron must 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. Frequent meals or events with the same supplier should be avoided.

Advertising and Promotional Materials. Lutron employees may occasionally accept or give advertising or promotional materials that contain the company's logo or name and are of nominal value.

Holiday Gifts. Lutron employees may accept or give holiday gifts of reasonable value.

Any individual item having a value in excess of \$25.00 USD must be approved by a Lutron supervisor in advance of acceptance or delivery. All items from or to the same supplier that have a value equal to or less than \$25.00 USD individually but total more than \$100.00 USD in any 12 month period must be reported to a Lutron supervisor immediately.

### **III. LABOR PRACTICES**

#### **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. Forced Labor**

Suppliers shall not use any forced, indentured, or prison (with the exception of legitimate paid prison labor/work programs) 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.

#### **4. 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.

#### **5. 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..

Link to: [Lutron's Anti-Slavery & Human Trafficking Annual Statements.](#)

#### **6. 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). To this effect, Lutron is committed to preventing the use of minerals that directly or indirectly finance or benefit armed/militant groups in the DRC or adjoining countries known to subject workers and indigenous people to human rights and labor abuses.

Lutron intends only to source conflict-mineral free materials and components from suppliers that have adopted the Responsible Business Alliance's (RBA) (f/k/a Electronic Industry Citizenship Coalition) [Code of Conduct](#). Suppliers should only supply conflict-free materials and components and 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.

Link to: [Conflict Minerals Policy](#)

#### **IV. TRADE LAW COMPLIANCE**

##### **1. Denied Parties and OFAC Sanctioned Countries**

Lutron will not include in its supply chain its suppliers who do business with [OFAC's Specially Designated Nationals and Blocked Persons](#) (listed here: <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>), 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 (listed here: <https://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>). 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.

##### **2. Anti-Money Laundering**

Suppliers may not knowingly engage in, or otherwise facilitate, money laundering activities, nor may suppliers enter into any contracts or transactions with parties appearing on [OFAC's list of Specially Designated Nationals](#).

#### **V. ENVIRONMENTAL PRACTICES**

Lutron values environmentally preferred products. Lutron works with and encourages its suppliers to create products that are energy efficient, highly recyclable, and contain recycled materials and the lowest amounts of hazardous materials. All suppliers to Lutron shall comply with all the environmental laws and regulations applicable to their operations worldwide. Such compliance shall include, among other things, the following items:

- obtaining and maintaining environmental permits and timely filing of required reports;
- proper handling and disposition of hazardous materials;
- monitoring, controlling, and treating discharges generated from operations; and
- conform to applicable labeling and warning requirements.

Adverse effects on the community, environment, and natural resources are to be minimized while safeguarding the health and safety of the public.

#### **VI. HEALTH AND SAFETY**

Lutron is committed to the safety and health of its employees and conducts its operations in compliance with applicable laws and regulations. Suppliers are expected to provide a safe working environment and must comply with all applicable health and safety laws and regulations in the countries in which they operate.

Suppliers shall, among other things, address the following:

- Be committed to the safety and health of its employees, and shall ensure that required training of personnel has been completed prior to initiating any work activity. The supplier should have or subscribe to a written safety and health program.
- Be responsible for addressing and controlling worker exposure to potential safety hazards in conformance with all applicable standards and/or regulations and by utilizing suitable means, e.g., design, engineering and administrative controls, preventative maintenance, training, work procedures, and appropriate personal protective equipment.
- Have emergency plans and response procedures that implement all applicable laws and regulations regarding emergency preparedness, addressing emergency reporting, notification and evacuation procedures, training and drills and appropriate hazard detection and suppression equipment.
- Have procedures and systems to manage, track, and report occupational injuries and illnesses.

## **VII. 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, and is used only for those business purposes for which the data is obtained. Suppliers acknowledge and will comply with rules regarding the transfer of personal data between certain countries. We expect that suppliers apply levels of data protection that are similar to our own—and never below the legal, contractual, or other binding obligations that may apply—when handling any information on our behalf, whether it's our employees' or our customers'.

Suppliers are also expected to ensure the confidentiality of data provided by Lutron. Suppliers are expected to maintain effective physical, technical, and administrative controls over the privacy and security of the data they are handling and must ensure that its subcontractors meet similar data protection standards. Finally, suppliers must report any suspected or actual data breaches involving the exposure of Lutron's data – whether Lutron's employees or customers.

## **VIII. COMMUNICATION**

Suppliers shall take appropriate steps to ensure that provisions of this Code are communicated to their employees and throughout their own supply chain. Suppliers shall ensure that the principles referred to above are adopted and applied by their employees, suppliers, agents, and subcontractors.