



## ANTI-SLAVERY AND HUMAN TRAFFICKING POSITION STATEMENT (FY 2019)

This statement is made on behalf of 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. It constitutes Lutron’s anti-slavery and human trafficking position statement for the financial year ending on 31 December 2019. It 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 in any part of our business.

### 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, 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 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

Lutron is focused on ensuring that modern slavery and human trafficking are not taking place in its global business and supply chain. Lutron Electronics Co., Inc.’s policies and processes, as a parent company as well as a supplier to its subsidiaries (e.g., Lutron EA), are fundamental considerations in both its own and its subsidiaries’ efforts to identify, tackle, and prevent modern slavery and human trafficking in its global business and supply chain.

### Supplier Adherence to Our Values

Within the entire Lutron organization, there is zero tolerance for slavery and human trafficking. Lutron performs periodic on-site audits of strategic suppliers. In addition, Lutron performs audits of new suppliers to evaluate risk and fit of these suppliers.

### Policies on Slavery and Human Trafficking

Lutron is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

#### 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 a commitment toward effective controls to ensure slavery and human trafficking is not taking place in supply chains. Specifically, the Supplier Code of Conduct provides for:

- **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.

Link to: [Supplier Code of Conduct \(revised and updated as of June 2019\)](#)

## **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.

Link to: [Conflict Minerals Policy \(revised and updated as of February 2019\)](#)

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

Since 2011 and 2016, Lutron has publicly posted on both its USA and UK/European websites, respectively, the steps it has taken in its supply chain to ensure and address that slavery and human trafficking are not taking place in its supply chain or in any part of its business.

Link to: [Lutron's Anti-Slavery and Human Trafficking Annual Position Statement \(published in 2019 for FY 2018\)](#)

## **Due Diligence Processes for Slavery and Human Trafficking**

### **1. Sourcing from reputable suppliers.**

The vast majority of electrical components are sourced from distributors that are large publicly traded multi-national companies. In addition to Lutron's due diligence on these suppliers, Lutron relies on their respective Anti-Slavery and Human Trafficking statements as endorsed by their executive teams.

**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.

Link to: [RBA Code of Conduct](#)

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

Solder used in Lutron's manufacturing process is purchased from suppliers that participate in the RMI's Responsible Minerals Assurance Process (RMAP) (f/k/a Conflict Free Sourcing Initiative's (CFSI) Conflict Free Smelter Program).

Link to: [RMI's RMAP](#)

**4. Requiring suppliers to comply with local laws.**

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

Link to: [Lutron Electronic Co. Inc.'s Standard Terms and Conditions](#)

**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 graded on several factors, including human rights issues, such as a review for indicia of slavery, discrimination, human trafficking, child labor, and 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.

Link to: [Lutron's Supplier Code of Conduct and Lutron's Standard Terms and Conditions](#)

**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, since 2011 Lutron has provided 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.

This Anti-Slavery and Human Trafficking position statement for the financial year 2019 has been adopted on behalf of the Board of Directors of Lutron EA Limited as of *JANUARY 29, 2020*



**John R. Woodman**  
Managing Director for Lutron EA Limited