

Legrand Supplier Sustainability



INTRODUCTION

Legrand, North America (Legrand) is part of the Legrand Group, a global organization that operates in many different countries. The Legrand Group has developed an overall framework for sustainability that is organized into three key areas – environment, social, and governance. Our approach to sustainability in North America is aligned with this global framework – and adapted as appropriate and relevant to the context of our North American culture and economy.

Environment: the work done under the environment pillar is to understand Legrand’s environmental impacts, devise innovative mitigation strategies, and identify opportunities to leverage Legrand’s technology and expertise to help customers achieve their sustainability objectives in a cost-effective manner.

Social: at this stage in Legrand’s sustainability journey, the social agenda is strongly focused on employees and their families—supporting the professional development and personal well-being of more than 2600 associates across 25 different locations in the U.S., Mexico, and Canada.

Governance: the governance pillar refers to the values, principles and standards by which Legrand, and its key business partners and suppliers, conduct business.

These three “pillars” serve as the organizing principle for Legrand’s actions. They express an intention of continuous improvement within sustainability. Legrand has initiatives underway in each area and is actively exploring additional opportunities. Pursuing the sustainability commitment translates into greater benefits and tangible value for Legrand customers, business partners, employees and the broader community.

REGULATIONS AND COMMITMENTS

The expectations and requirements for vendors all along the economic value chain are subject to change. Legrand is actively evaluating the regulatory environment and evolving customer expectations in these areas, as well as determining the information and performance needs associated with our own supplier and sustainability performance expectations. This statement will be updated as needed to reflect such changes and our suppliers are invited to engage in dialogue with us on these issues, as well as to offer insights into any relevant information or processes that can support adherence to these and other aspects of supplier performance.

Below are a number of regulations/laws and commitments to which Legrand is working to ensure its conformity and/or understand the applicability to its own operations. Specifically

regarding chemical regulations (of which RoHS and REACH are prominent examples), the view of Legrand toward its suppliers in regards to chemical use can be characterized in three ways:

- Superior Commitment - Provides detailed evidence of REACH/RoHS compliance for all materials/products.
- Participating Supporter - Responds to specific requests for information on REACH/RoHS substances in materials/products. Proposes suitable alternatives when needed.
- Non-Contributor - Not currently able to provide information on the REACH/RoHS substances in materials/products.

RoHS Position

- Legrand supports the reduction and eventual elimination of the use of all substances restricted under the EU's RoHS (Restriction of Hazardous Substances) directive
 - Lead
 - Mercury
 - Cadmium
 - Hexavalent chromium
 - Polybrominated Biphenyls (PBBs)
 - Polybrominated Diphenyl Ethers (PBDEs)
- Legrand will meet mandatory regulations in regional markets in which its products are sold, such as CE Marking and European Environmental Directives (RoHS)
- Beyond our commitment to comply with mandatory regulations, Legrand will also strive, wherever practical, to take advantage of opportunities to eliminate RoHS substances in its products.
- Legrand will rely primarily on the commitments of its supply chain vendors to ensure that the restricted hazardous substances are not unacceptably present in its products. Periodic product/material testing is encouraged by suppliers, but not mandatory. Legrand reserves the right to test any product to validate its composition.
- Each Legrand entity shall annually report:
 - The extent of its sales volume (\$'s) which meet the hazardous material restriction requirements of RoHS
 - Its goal (% improvement) for increasing the level of sales adhering to the requirements
- The development (or sourcing) process for all NEW PRODUCTS must consider both the market desirability for, and approximate cost of, meeting RoHS material restrictions.

REACH Position

REACH is an EU (European Union) regulation dealing with the Registration, Evaluation, Authorization and Restriction of Chemicals. It applies to chemical substances (and products made with them) manufactured in or imported into the EU. Legrand is monitoring the regular updates to the list of Substances of Very High Concern (SVHCs) and evaluating their potential impact on our products. We prefer vendors who can supply information on material content, especially as it applies to SVHCs, on the materials/products we buy from them.

Dodd-Frank Act, Section 1502: Conflict Minerals Position

Legrand North America and its subsidiaries ("Legrand") are committed to sourcing components and materials from companies that share our values regarding respect for human rights, integrity and environmental responsibility.

Legrand is committed to complying with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as the applicable requirements of Section 1502 of the Dodd-Frank Act, which aims to prevent the use of minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or in adjoining countries ("conflict minerals").

Affected suppliers to Legrand will be required to commit to being or becoming "conflict-free" (which means that such supplier does not source conflict minerals) and sourcing, where possible, only from conflict-free smelters. Each affected supplier to Legrand will be required to provide completed EICC-GeSI declarations evidencing such supplier's commitment to becoming conflict-free and documenting countries of origin for the tin, tantalum, tungsten, and gold that it purchases.

For more information on Legrand's conflict minerals program contact conflict.minerals@legrand.us

For more information on the Conflict Minerals ruling, copy and paste the following link into your browser: <http://www.sec.gov/rules/final/2012/34-67716.pdf>

California Law SB 657: Human Trafficking

Legrand divisions doing business in the state of California are taking steps to ensure they and their suppliers do not participate in human trafficking. This regulation seeks to eradicate forced labor by requiring that larger retailers and manufacturers doing business within California audit and validate their suppliers for human trafficking violations. We expect that our suppliers, present and future, will abide by this regulation to help end human trafficking and help us meet our commitment to comply with the California Transparency in Supply Chains Act. For more

information on SB 657, copy and paste the following link into your browser:

<http://www.state.gov/documents/organization/164934.pdf>

Supplier Scorecard

Legrand divisions evaluate their suppliers through the use of a Supplier Scorecard. The Legrand scorecard has 5 sections: Delivery, Quality, Responsiveness, Commercial Considerations, and Sustainability. The first four sections are scored quarterly by Legrand, while Sustainability is an annual supplier self-evaluation. The Sustainability section consists of 14 questions and comprises 10% of the overall Scorecard weight.

ISO 14001

Legrand is an ISO 14001 registered company. Our environmental policy states our commitment to prevent pollution, maintain environmental regulatory compliance, and continually improve our environmental performance. We require that our suppliers maintain compliance with their own environmental regulations so that our business relationship is not adversely affected.

Legrand encourages its suppliers to become ISO 14001 registered or adhere to the principles of an Environmental Management System. Having an Environmental Management System (EMS) in place demonstrates a commitment to improving the environment, helps establish environmental goals, improves environmental performance and reduces risk. Additionally, improved environmental performance often results in reductions in costs. Legrand prefers suppliers who can demonstrate their commitment to improving their environmental performance. We will provide guidance on the EMS approach when requested.

UN Global Compact

Since 2006, the Legrand Group has been a member of the UN Global Compact. In an effort to eradicate ethical, social and operational malpractice within the international business community, the UN Global Compact sets out ten universally accepted principles that cover labor, human rights, environment and anti-corruption. Legrand strongly encourages its suppliers to sign onto the Compact and support a better way of doing business. For more information, copy the following link into an internet browser: <http://www.unglobalcompact.org/>

Legrand appreciates suppliers' cooperation, support, and efforts to conform with Legrand's intentions and standards for product stewardship. In the ever-evolving regulatory environment it is our ambition to continually meet and exceed our customers' expectations. We cannot fulfill our ambition without the hard work of our suppliers.