

The California Transparency in Supply Chains Act Statement

Leviton Manufacturing Co., Inc. and its affiliate companies ("Leviton") are committed to the highest standards of ethical and responsible business conduct. Leviton does not accept involuntary servitude, child labor, exploitation of children, or any other form of unacceptable treatment of workers in our facilities or in our suppliers' operations. Leviton abides by all applicable laws and requires the same of its supply chain. As such, it has taken specific actions to ensure compliance in banning human trafficking, slavery and child labor from its supply chain.

In accordance with the California Transparency in Supply Chains Act (California Civil Code §1714.43) ("CA Supply Chains Act"), Leviton makes the following disclosure regarding its efforts to eradicate illegal labor practices from its supply chain:

- Verification. Leviton periodically reviews its supply chain to evaluate and address risks of human trafficking and slavery. Risks considered include a preliminary assessment based upon the location, commodity purchased, the supplier's ownership structure, supplier quality performance and the nature of the business transaction. The risk assessment is periodically shared with Senior Management.
- 2. Audits. Through its supply chain employees, Leviton conducts periodic audits of highrisk suppliers to evaluate their compliance with the CA Supply Chains Act as part of a general supplier audit. These audits are independent and announced. Leviton chooses which facilities to audit based upon the risk assessment described above in the Verification section. Following audits, suppliers may be required to complete corrective action plans to Leviton for review and approval. A corrective action plan outlines how a supplier should resolve issues uncovered in an audit, includes clear responsibility for resolution and a timeline for completion. Leviton may return to the facility within 6-12 months as needed to confirm implementation of the action plan. To date, forced labor has not been identified by any third-party or internal assessments of our supply chain. Leviton's risk assessments thus far have demonstrated that the risk for issues such as forced labor and child labor (as well as other human rights and working conditions issues) are relatively low for direct suppliers. The risk may increase further down the supply chain, closer to the source of the raw materials. Leviton does not generally have visibility or direct access to these lower-tiered suppliers for purposes of verification, and thus Leviton depends on its direct suppliers to reduce those risks and alert it to any specific violations. If Leviton discovers an instance of abuse, it will be escalated immediately to company Senior Management to evaluate the matter.
- 3. **Certification**. It is a material condition of Leviton purchase terms and direct supplier contracts that our direct suppliers do not tolerate human trafficking or slavery in their

respective supply chains and comply with all applicable laws. In addition, a sampling of suppliers are selected to answer a detailed questionnaire and self-certify that they do not employ victims of human trafficking or slavery.

- 4. Internal Accountability. Leviton incorporates the prohibition on human trafficking in its Supplier Conduct Guidelines and maintains internal accountability standards and procedures for business partners failing to meet company requirements embodied in the Leviton Supplier Conduct Guidelines. Leviton reserves the right to terminate our relationship with a supplier if it is found to be noncompliant and the issue not timely corrected. For the terms of our Supplier Conduct Guidelines, <u>click here</u>. In addition, Leviton encourages employees to report any concerns to a supervisor, and if uncomfortable, to raise any concerns anonymously on its ethics hotline. Leviton does not retaliate against employees for good-faith reporting of concerns.
- 5. **Training**. Leviton promotes awareness of human trafficking and slavery through periodic training of those with direct responsibility for supply chain management.