



Modern slavery statement for the financial year ending 31 December 2018

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Legrand Electric Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Legrand Electric Ltd has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all our business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

Our business

Legrand is the global specialist in electrical and digital building infrastructures. Legrand has a presence in nearly 90 countries and a workforce of over 37,000 employees.

Legrand Electric Ltd has been manufacturing in the UK since 1980, and today has three main competencies – electronic, electrical and mechanical. Around 80 per cent of the products sold by the UK subsidiary are manufactured within the UK.

The UK company is organised into the following specialist business units: Cable Management, Power Distribution, Wiring Devices, Assisted Living and Healthcare, Energy Controls and Digital Infrastructure and has over 700 employees.

Our policies in relation to modern slavery

Human Rights

Legrand's approach to human rights is to ensure that it applies not only national laws, but also international human rights standards, such as the Universal Declaration of Human Rights and the eight ILO Fundamental Conventions, not only on its own sites but also by ensuring that these values are respected in its supply chain. These aims are in line with the UN Guiding Principles published in 2011, which provide a standard to prevent and address all discrepancies within the 'Protect, Respect and Remedy' framework.

Our international presence means that we have to deal with very different realities in the field, both in cultural and social terms. This is one of the reasons why a global scope of action that respects individuals is essential. Decent employment conditions, absence of discrimination, health and safety and refusal of child labour and forced labour are all essential areas in which Legrand chooses to act and communicate.



With this firm commitment to fundamental rights, the Group undertakes to:

- Remedy any violation of employee rights on its sites,
- Eliminate any form of forced or mandatory labour and fight against child labour,
- Eliminate discrimination in respect of employment and occupation,
- Protect health and safety at work.

Legrand's teams act with conviction. Respect for human beings and their dignity are at the core of our corporate values. Our [Human Rights Charter](#) provides an overview of the principles that Legrand intends to apply and is a common reference framework for all of our employees and suppliers around the world.

Business ethics

Observing the rules of ethical behaviour is one of Legrand's fundamental values. Based on its identity as an ethical company, Legrand is committed to preventing corruption and fraud and observing the rules of competition. The Group also organises itself to avoid conflicts of interest and fights against embargoes, money laundering, and the funding of terrorism.

This is achieved on the one hand by raising awareness and training its teams, and on the other hand by closely monitoring that its compliance programme is properly implemented. Observing ethical rules requires prior, specific and strong awareness raising on such topics. The aim of Legrand's training programmes is to ensure that employees likely to encounter risky situations will be thoroughly familiar with the rules of business ethics. This reduces the likelihood of competition law, anti-corruption laws, and anti-money laundering or export control regulations being breached in all of the Group's subsidiaries and entities. To date almost 2,300 Legrand employees have been trained in business ethics.

A compliance programme is in place formalising Legrand's commitment to acting ethically. 80 countries are involved in the deployment of the compliance programme. Every country director has signed a letter of commitment pledging support for the compliance programme and every employee undertakes to adopt ethical behaviour. Adherence to the programme is monitored by the Group Internal Audit department.

Ethics and fraud alert

An ethics alert system is in operation, which is accessible to all Group stakeholders in the event of problems involving accounting and/or financial matters, corruption, competition law, serious damage to the environment or the safety of people, unethical behaviour (discrimination and harassment), data protection, or a conflict of interest.

These alerts may be raised with the Group Compliance Officer and the Group Vice President Human Resources via the email address: ethics.legrand@legrandelectric.com.



Whistleblowing Policy

Legrand provides whistle-blowers with protection against reprisals. This means that no-one may suffer reprisals, or threats of reprisals, because they have reported an ethics or fraud issue in good faith.

Our Supply Chain – Ensuring responsible purchasing

Faced with the globalisation of business and markets, Legrand is working with suppliers from many different countries and cultures, with highly contrasting social and environmental practices.

Legrand expects its suppliers and subcontractors to meet the same standards of social and environmental responsibility that it imposes on itself. Legrand engages with them and supports them with a progress-oriented approach. In the context of the Responsible Purchasing strategy, respect for the rights of Legrand's suppliers' and subcontractors' employees is also taken into account. This is part of the supplier approval procedure.

Legrand's purchasing specifications have therefore integrated Legrand's requirements in terms of the environment, health and safety at work, respect for human rights and compliance with labour law. Likewise, supplier contracts incorporate a paragraph dedicated to supplier social, societal, and environmental responsibility.

Legrand expects its suppliers to observe the same standards of responsibility as it does. For example, Group suppliers, who are major players in their market and key partners of Legrand, are encouraged to comply with the principles of the [Global Compact](#), to be consistent with Legrand's membership of it. More than 60% of the Group panel's purchases are with suppliers who share the principles of the Global Compact.

Our suppliers are loyal and effective partners for a mutually beneficial relationship: international suppliers for the Group's global needs, local ones for site specific needs. They are agile companies that meet our expectations and respect the Group's values in terms of the environment, fundamental rights at work and business ethics.

Legrand's commitment to human rights takes the form of a risk mapping process, carried out for all of the group's countries since 2013. This mapping creates a classification of the countries where the group operates, based on the ratification of the eight ILO conventions concerning the fundamental principles and rights at work and the Freedom in the World index.

In 2017, 67% of the Group's employees, excluding companies acquired less than three years ago, were located in free countries. 33% of employees are based in countries that are either "not free" or "partially free".



Legrand evaluates subsidiaries located in countries identified as non-free according to the Freedom in the World Index, based on the methodology of the Danish Institute for Human Rights. The aim is to promote their awareness of human rights and evaluate their observance of fundamental human rights at work in order to define specific action plans to further rights.

A sensitive supplier in terms of social responsibility is a supplier whose activity may pose an environmental risk or a risk to health and safety at work for its employees. The methodology deployed in the Group also takes risk factors related to the country where the supplier is located and the level of the supplier's dependency on Legrand into account.

Sensitive suppliers are subject to special monitoring governed by the Group's CSR roadmap.

The priority consists of identifying who are the sensitive suppliers and to support them with a continuous environmental, social and societal performance improvement process. In 2017, 87% of Legrand's sensitive suppliers are covered by a support plan on environmental issues, fundamental rights at work and business ethics.

Approval for this statement

This statement was approved by the Board of Directors on 15 April 2019

A handwritten signature in blue ink, appearing to read 'Tony Greig', written over a faint, illegible stamp or watermark.

Tony Greig
Chief Executive Officer

Date: 15 April 2019