

Statement on Due Diligence Assessments

Ledvance AS – 2024

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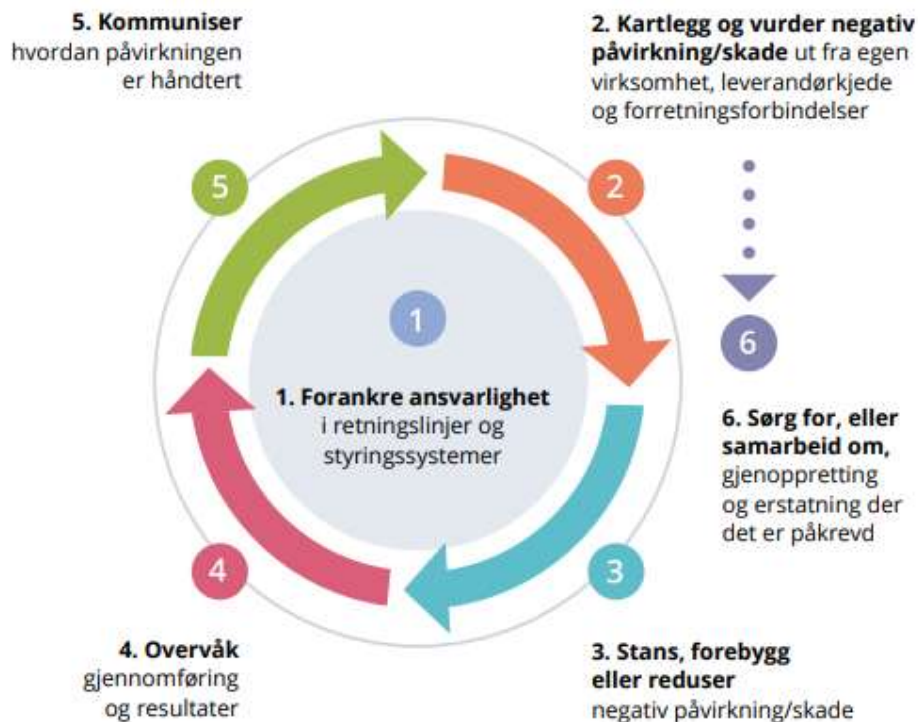
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1. Introduction

The central obligation in the Transparency Act (Åpenhetsloven) §4 requires us to conduct a yearly due diligence assessment and make this assessment available to the public by the 30th of June. As a basis we strive to follow the OECD's method:



This report shows the mappings and risk assessments that has been executed to find and prevent negative impact on fundamental human rights and ensure decent working conditions in our own operations and supply/value chain.

2. Organization and Operational Area

LEDVANCE is a world-leading company that delivers modern, groundbreaking lighting technologies in combination with traditional lighting. LEDVANCE offers light sources, smart home products, lamps,

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fixtures, and accessories to professionals and consumers. The products are sold through distributors to the professional and project market, as well as in specialty stores and grocery stores to private consumers. The company has offices in more than 50 countries and business operations in more than 140 countries. Ledvance's headquarter is located in Garching near München, Germany. In Norway, we have 23 employees, and the headquarter is located in Lysaker, Oslo. Globally, Ledvance has about 2700 employees.

Some Key Guidelines and Procedures for Ledvance AS

Ledvance AS continuously works with guidelines and management systems together with the parent company in Germany, Ledvance GmbH.

Accountability and contact points are outlined in the employee handbook, which all employees have access to.

The overall responsibility lies with the Board and MD.

We have developed procedures and guidelines, and joined initiatives for, among others:

- **Code of Conduct** for employees and for suppliers/business partners.
- **Global People & Culture Guideline.**
- **Global Sustainability Report.**
- **Certification via ECOVADIS (silver in 2024).**
- **Responsible Minerals Initiative (RMI)**
- **Amfori – full member**
- **Whistleblowing system** LiLi established on the intranet, where employees can report anonymously.

We commit to following international conventions such as UN Global Compact and ILO for labor and social standards (International Labor Organization).

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3. Actual Negative Consequences and Significant Risks of Negative Consequences Identified Through Our Due Diligence Assessment

3.1. Own operations and business partners

For our own operations and our business partners, we have assessed the risk of negative consequences to be LOW. There are annual/bi-annual anonymous work environment surveys performed to perform checks on our own operations and locations, and the internal whistleblowing system (LiLi) is available to all employees and informed about upon hiring. For our business partners, a CSR Check with parameters “Norway and Lighting fixture and fittings” has been executed 23rd of May 2025 and every third year, a due diligence for business partners within legal and transport is also performed and archived.

We have as well prepared and used an own questionnaire for control of some of the specific topics related to Åpenhetsloven, and this questionnaire have been sent to a number of our business partners.

So far, no actual negative consequences have been identified.

3.2. Suppliers

We have one main supplier, which is also our parent company, Ledvance GmbH. 99 % of the products we sell comes from this supplier. Since 2022, Ledvance GmbH has published a voluntary Sustainability Report which among other topics also gives a thorough overview of the measures that are taken to ensure we have no breaches in our effort to secure human rights and labor rights throughout our supply chain.

As information from the Sustainability Report from 2024 shows, all Ledvance GmbH’s suppliers must adhere to the Code of Conduct. Furthermore, the requirements of the German Due Diligence Act (LkSG) and the guidelines of the OECD Supply Chain Due Diligence Guidance gives a basis for the strengthening of the commitment to RMI and to the ongoing work on setting up a supply chain due diligence management system to address human rights and environmental issues along the supply chain.

The majority of the products from Ledvance GmbH are manufactured in China. A CSR Check with parameters “China and Lighting fixture and fittings” and “China and Water Transport” conducted on 23rd of May 2025 shows high risk for breaches of Human Rights and Ethics and for Labor Rights and

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Working Conditions. Based on this, we assess the risk of negative consequences to be MEDIUM to HIGH.

Still, no actual negative consequences have been identified.

During the last year, we have also cooperated with a few local suppliers for deliveries of electric components and smaller and larger components for mounting of luminaires. The countries of origin for the purchased products are both Norway and other countries. As for products purchased via Ledvance GmbH, the risk of negative consequences is partly linked to country of origin.

Still, no actual negative consequences have been identified.

4. Measures We Implement to Stop or Limit Negative Consequences

4.1. What has been done

Our Code of Conduct for Suppliers is signed, and one of its key messages is that human rights and decent working conditions must be adhered to. As Ledvance's Sustainability Report for 2024 shows, there has been taken extensive measures to ensure due diligence along the value chain. Examples of this is our memberships in RMI together with the pledge to uphold the principles in the UN Global Compact.

4.2. What will be done going forward

Ledvance GmbH has been working on, and is still implementing the German Due Diligence Act, which has many elements that coincide with the Norwegian Transparency Act. As a further improvement Ledvance GmbH will set up a supply chain due diligence management system to be able to systematically address issues along the supply chain. This will, as well as globally also locally, make us able to follow up on potential high-risk topics.

We will also see to it that we ensure that all new local suppliers will sign the Code of Conduct for Suppliers. We will also monitor their own assessments on the Norwegian Transparency Act and follow up on specific high-risk topics when this is necessary.

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5. Contact information

For any questions related to the information in this report, please contact us at:

kundeservice@ledvance.com

6. Board's Signature

Markus Emmert

CFO

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