



LEDVANCE LLC Conflict Minerals Policy 2020

LEDVANCE LLC is a global leader in general lighting. The company sells products for homes and businesses under the SYLVANIA brand, known for high quality, energy savings, and for being backed by reliable service and delivered by a solid global supply chain. We offer LED and traditional lighting, standardized LED luminaires, and connected smart lighting and accessories.

Policy on Conflict Minerals

One of the aspects of a sustainable supply chain that has gained special relevance is the issue of “conflict minerals”. For that reason, LEDVANCE has a policy to supplement our Code of Conduct for Suppliers.

The conflict minerals of concern are those used to produce tantalum, tin, tungsten, and gold which originate from mines in areas under control of armed groups in the Democratic Republic of Congo (“DRC”) and certain adjoining countries. These mines may finance armed groups and fuel human rights atrocities committed by such armed groups in the eastern region of the DRC.

Code of Conduct for Suppliers

Our “Code of Conduct for Suppliers” requires our suppliers to respect the basic human rights of employees and others and prohibited our suppliers and their respective suppliers from being complicit in illegal and unethical conduct. However, the issue of conflict minerals requires a more stringent approach covering the entire supply chain down to the very origin of these materials. For that reason, we have this policy to supplement our Code of Conduct for Suppliers.

Conflict-free supply chain

With its strong commitment to corporate responsibility as a global citizen, LEDVANCE intends to specifically address the risk that tantalum, tin, tungsten, and gold used in our products are potentially derived from conflict minerals. Thus, we are committed to ensuring that our supply chain will be “conflict-free”. We work with our suppliers towards this end. The issue of conflict minerals used in the supply chain of the lighting and other industries is extremely complex and resolution will require the cooperation of enterprises, non-governmental organizations and governments. We are evaluating different approaches and multi-stakeholder initiatives in this regard, such as the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” and the EICC - GeSI “Conflict Free Smelter Program”.

We will continue to comply with applicable laws and adopt industry best practices to ensure that all materials in our products come from socially and environmentally responsible sources.

Ensuring accountability

LEDVANCE has systems and processes in place to ensure accountability in our supply chain and we will improve these systems as necessary to meet new requirements. We recognize that many of our business partners and customers face uncertainty with respect to compliance with the rules by the U.S. Securities and Exchange Commission and other regulations regarding conflict minerals. We will work with our business partners with the goal of providing them with the necessary assurances that our supply chain is “conflict-free.”

This policy will be reviewed regularly and updated as needed. We will disclose the progress of the implementation of this policy as well as any other updates and developments.

Our global headquarters is located in Garching, Germany, and our North American headquarters is in Wilmington, Massachusetts.