Conflict minerals Legrand's Policy

2023



Legrand, including its subsidiaries (collectively "Legrand"), is committed to buying from responsible and trusted sources, and forbids sourcing minerals that contribute to armed conflict or human rights abuses in conflict-affected and highrisk areas, including the Democratic Republic of Congo (DRC) and adjoining countries.

As a responsible player, the Group supports OECD initiatives by following the recommendations of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

In several countries around the world, the mining of certain minerals is believed to be supporting armed groups, conflicts and crimes against the civilian population. The main minerals involved, known as 'conflict minerals', are Tin, Tantalum, Tungsten and Gold, also known as "3TG", as well as Mica and Cobalt. As a consequence, since 2012, Section 1502 of the Dodd-Frank Act regulates the use of conflict minerals. In the European Union, a similar law, Regulation 2017/821 of May 17, 2017, establishes supply chain due diligence obligations for importers of minerals from conflict-affected areas and high-risk areas.

Legrand is committed not to purchase such minerals directly or indirectly from a conflict-affected or high-risk zone.

Legrand's approach is to promote traceability and transparency amongst the supply chains from suppliers to customers to promote and reinforce a conflict-free global supply chain.

Legrand supports the Responsible Minerals Initiative (RMI), using standard processes designed to obtain chain of custody declarations from all relevant suppliers to ensure sourcing transparency.

Legrand is committed to communicating to its customers the information known about its supply chain related to conflict minerals.

Legrand requires all its suppliers to comply with applicable regulations on conflict minerals.

Suppliers are requested to put in place traceability for these minerals to prevent a sourcing from conflict-affected and highrisk areas. Legrand encourages its suppliers to apply the same principles to their own value chain.

We expect Legrand suppliers to ensure responsible sourcing and respect for fundamental human rights:

- Respect Legrand Group's Supplier Code of conduct, in which this Conflict Minerals policy is included
- Follow the OECD Due Diligence Guidance and put in place controls to monitor the origin of minerals purchased
- Provide duly completed CMRT and EMRT templates, designed by RMI
- Exercise due diligence regarding the source and chain of custody of restricted minerals and make such due diligence available to us upon request

In accordance with Legrand's processes, any failure to comply with or adhere to the fundamental principles, rules and regulations set out in this policy or any related regulations may have consequences for the business relationship, up to and including its termination.

> Séréna SALAMÉ Group CPO

> DISPLAYING THIS POLICY ON ALL GROUP SITES SERVES AS A REMINDER OF our responsibility and the personal commitment expected of us all

