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LEDVANCE has a tradition of conducting business in a way that is socially and environmentally responsible. Our "Code of Conduct for Suppliers" is based, in part, on the UN Global Compact and the principles of the International Labor Organization. With the same strong commitment to its social and environmental responsibility as a global citizen, LEDVANCE is addressing the risk that minerals used in our products could directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo (DRC) and the adjoining countries and regions. LEDVANCE is committed to support industry-wide, multi-stakeholder initiatives to prevent serious human rights violations in the conflict areas. Therefore, we have put systems and processes in place to ensure accountability, and we will continuously improve these as necessary to meet new requirements.

Subsequent to the adoption of implementation rules (the "Final Rule") regarding Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act" by the U.S. Securities and Exchange Commission on August 22, 2012, LEDVANCE has implemented an approach to better help customers comply with the Final Rule. The following steps are part of the LEDVANCE approach, we:

- Adopted and distributed a policy on the responsible sourcing of conflict minerals.
- Evaluate different approaches and multi-stakeholder initiatives, such as the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" and the CFSI "Conflict Free Smelter Program".
- Adopted the widely accepted 'CFSI Conflict Minerals Reporting Template'.
- Implemented a "Conflict Minerals Code" for relevant suppliers that supplements our standard code of conduct. This code requires suppliers to fully commit to avoiding the use and sale of conflict minerals that contribute to the ongoing conflict in the covered countries.
- Require all relevant suppliers of products containing conflict minerals to identify the smelters/refiners in their supply chains.

Status of the conflict minerals-free-efforts at LEDVANCE: LEDVANCE does not purchase ore or unrefined conflict minerals directly from mines. Generally, we are several steps ahead in the supply chain. We source materials from a global network of suppliers. Since 2012, we have performed reasonable country of origin inquiries and conducted due diligence. We have achieved 95% transparency for the country of origin of sourced materials, and we are striving towards 100% transparency by the end of September, 2017.

We will continue working with our suppliers to obtain the necessary assurances and documentation from them, with the goal of providing our customers with full product transparency.

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