

Glamox Group Modern Slavery Statement for 2022

Introduction

Business ethics is a core value for Glamox, and we are committed to conducting business responsibly, oppose modern slavery in all its forms, and are committed to ensure that there is no slavery or human trafficking in our operations or our supply chain. All procurement activities are done with set of clear expectations and requirements to all our suppliers. Glamox expects its suppliers to commit to the obligations in our Code of Conduct, Responsible Business Partner policy and contractual clauses with particular focus on child or compulsory labour, human trafficking, slavery and any behaviour that does not maintain human dignity and respect.

This statement intends to provide details of the steps we have taken as a business during the last financial year towards ensuring that slavery and human trafficking are not taking place in our organization or in our supply chain.

This statement is made in adherence of section 54 (1) of the Modern Slavery Act 2015 (MSA), and constitutes Glamox' slavery and human trafficking statement for the financial year ending 31 December 2022.

Glamox

Glamox is a global group of companies that develops, manufactures and distributes professional lighting solutions for the global market. Glamox is a leading supplier to the world's marine and offshore markets, and a leading supplier to the professional building market in Europe.

The Group is headed by Glamox AS, a Norwegian limited liability company registered in Molde with its headquarter based in Oslo, Norway. Glamox Group is a global organization, with 2,200 employees, and sales and production in several European countries, as well as in Asia and North America. We have divided the operations between three divisions: Professional Building Solutions, Marine, Offshore and Wind, and Sourcing, Production and Logistic.

Relevant Policies

Glamox and its employees are committed to act ethically, with integrity and transparency, in all business relations and dealings. Glamox is constantly working to ensure that effective systems and controlling mechanisms are in place to prevent unethical business conduct

Glamox puts attention into creating an open working environment, which allows employees and third parties to raise concerns regarding serious wrongdoing. Glamox Whistleblowing Policy was updated in 2022 and an external web based solution enables anonymous reporting. Our whistleblowing service (<https://report.whistleb.com/en/glamox>) allows employees and any third parties to report wrongdoing, such as serious irregularities concerning breaches or suspected breaches of laws, regulations or Glamox Code of Conduct affecting people, our organisation, the society, or the environment. This includes violations of human and labour rights such as the right to freedom of association, recognition of the right to collective bargaining, forced, compulsory and child labour.

The Glamox Group Strategic Procurement team is continuously developing policies and clear principles for ensuring that all procurement activities are carried out in a sustainable manner, in order to reduce environmental impacts. In 2022, Glamox Procurement team introduced a new Procurement Policy to ensure that all supplied products and services are performed in a compliant and sustainable manner.

Glamox believes equality and fairness for all employees are important. We do not tolerate discrimination on grounds of gender, marital status, civil partnership status, pregnancy, race, ethnic origin, color, nationality, national origin, disability, sexual orientation, religion or belief, or age. All employees shall be treated with dignity and respect, and free from harassment, intimidation or other forms of bullying at work. The employees are free to join or form unions within the laws and regulations of each country, and to let them represent them in negotiations.

Glamox Corporate Social Responsibility Policy (CSR) sets out clear and uniformed standards for ensuring that all our business operations are carried out in an ethical manner. The Corporate Social Responsibility Policy is built based on the UN (United Nations) Global Compact's 10 principles.

The Group HR & Legal Director is the Group Compliance Officer and a part of the Group Management Team reporting to the CEO, and is responsible for developing Glamox' Group level policies and procedures in the abovementioned fields. Our Vice President Procurement heading up the Group Strategic Procurement team is responsible for our supply chain policies and follow up of supplier verifications.

Responsible Supply Chain

Glamox operates a Responsible Business Partner Policy, which defines expectations to third parties, including suppliers. A key policy principle is that Glamox will not tolerate the use by its business partners or their supply chains of child or compulsory labour, human trafficking, slavery and any behavior that does not maintain human dignity and respect.

In 2022, Glamox Group has continued to strengthen its effort to further develop a sustainable supply chain. The Group Strategic Procurement team continued working on a strict and clearly defined supplier selection and assessment process, including attention to modern slavery and human trafficking issues. As we fully recognize the potential of digital solutions for automated supplier assessment process and ensuring scalability and consistence across our supply chain, we use the best available technology to support our mission.

Since 2020 we screen our direct suppliers via IntegrityNext, a digital cloud-based platform that covers topics such as ethical behaviour, health and safety, management and owners (screening against sanction lists) and compliance with human rights and screening against critical news.

445 suppliers were screened as of year-end 2022. This covers approximately 83 % of the total spend. Glamox continues its screening process in 2023 and will include both direct and indirect suppliers in IntegrityNext. In Q1 2023 additional 232 suppliers have been approach for screening.

The assessment of our suppliers' sustainability rating is carried out systematically and is now a mandatory requirement for all our key direct suppliers. To date no agreement has been terminated as a result of screening.

Risk assessments

Human rights areas monitored in the supply chain are related to safe and decent working conditions, health, discrimination, freedom of association and collective bargaining. The risk of incidents of child labour abuse, compulsory or forced labour is also monitored. In addition, our suppliers must comply with the conflicting mineral reporting template as issued by the Responsible Mineral Initiative. This is addressed in our supplier screenings, supplier agreements and supplier audits and regular dialogue with the suppliers and we seek ways to mitigate our impact when and where relevant.

Glamox has not detected significant adverse impacts in our supply chain through our due diligence processes, including our grievance mechanisms.

If we identify any concerns related to these issues, we conduct a more comprehensive review or audit of the potential supplier to clarify if the supplier meets our requirements before any agreements are signed. In 2022 we also conducted on-site supplier audits, all of which included topics related to HSE, human rights and working conditions.

Glamox assessment is that the biggest potential risk of slavery and human trafficking for the group lies in our supply chain. The procurement team continues their efforts in developing supplier onboarding, screening and monitoring processes driven by a risk-based approach. The utilization of the external platform supports this effort to mitigate the inherent risks.

Board Approval

This statement was approved on the 27th of April 2023 by the board of Glamox AS, who will review and update it annually.