



## Introduction

Business ethics is a core value for Glamox, and we are committed to conducting business responsibly. Glamox recognizes that an important part of ethical business conduct is being alert to and preventing the risks of cruel practices like slavery and human trafficking taking part in our business, including our supply chain. 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 2021.

## 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 2,400 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, Global Marine and Offshore and Sourcing, Production and Logistic.

## Relevant Policies

Glamox and its employees are committed to acting 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. In 2021 Glamox integrated and improved internal compliance policies in the companies acquired in 2021: Luminell, Wasco and LitelP. Further, during 2021, Glamox Group strengthened the knowledge, inclusiveness and engagement of employees by training in the principles and values expressed in the Code of Conduct and other compliance policies.

Glamox puts attention into creating an open working environment, which allows employees to raise potential concerns towards policies and principles defined by the company, including human trafficking, forced labour etc. Glamox operates an annual compliance certification process, which includes asking the extended management team of around 50 central and local leaders to confirm if they are aware of any breach of law or key compliance policies. All leaders confirmed no knowledge of, and there has not been any reporting through the whistleblowing procedures available to all employees, relating to modern slavery.

In order to further improve the current Whistleblowing Policy, in 2021 the Company has performed a selection process to implement an external tool enabling anonymous reporting. The selected solution and revised Whistleblowing Policy will be implemented during 2022.

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.

## **Our Suppliers**

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 2021 the Glamox Group Strategic Procurement team developed a set of clear principles for ensuring that all procurement activities are carried out in a sustainable manner, in order to reduce environmental impacts and in accordance with applicable laws, regulations, recognized standards and Glamox Code of Conduct. The new Glamox Procurement Policy shall be effective from Q2 2022.

During 2021 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 are using an external platform to assess and monitor our suppliers' compliance with applicable regulations in terms of environment, human rights and labor, anti-bribery, anti-corruption, supply chain responsibility, environmental protection, health and safety, product sustainability and blacklist and sanctions regulations, in addition to commercial topics such as quality management and corporate and financial condition evaluation. In 2021 we have assessed 359 key direct suppliers and achieved 88% response rate from our direct supplier base, including applying the process for new critical suppliers prior to awarding new contracts. The tool has been integrated with the existing ERP system used in Glamox.

Specific requirements for the business conduct of the suppliers to be in accordance with law and defined ESG best practices have been incorporated into our revised general terms and conditions for suppliers, which were implemented during 2021.

## **Risk assessments & Training**

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. In 2021 there were still limited possibilities of performing on-site supplier audits due to the Covid-19 pandemic and travel restriction, however new critical suppliers have been audited either on site or remotely. This auditing process will be continued in 2022.

Glamox top management clearly and regularly emphasizes commitment to ethical business conduct in their communication. One of our goals for 2021 was to constantly improve the awareness of our employees of the ESG topics, and provide refresher trainings on relevant topics to the relevant parts of the organization. All Glamox Group Strategic Procurement employees have knowledge and understanding of the Glamox Group Instructions and policies and are regularly trained in Glamox Code of Conduct principles, specifically pertaining to elements relevant for the supply chain.

Glamox has established its Sustainability strategy to emphasize and develop targets in this area further. Supplier compliance, environmental focus and energy efficiency progressed in 2021. In addition to this, circular design criteria for new products has been established. LED luminaires make up more than 95% of the luminaires we deliver, and we are sourcing 35% of our energy from renewable energy sources.

## **Board Approval**

This statement was approved on 21 June 2022 by the board of Glamox AS, who will review and update it annually.