

KNOW YOUR RESPONSIBILITIES REGARDING

# Legrand's Business Ethics & Compliance Program

Legrand's compliance program focuses on Four Key Pillars that sustain the Fundamental Principles and anchor Legrand's Corporate Social Responsibility framework.

Legrand's employees and sales/supplier partners are expected to be familiar with the tenets of this program and to be vigilant and active in complying with them.

Employees, suppliers and customers are encouraged to report illegal or unethical behavior via [legrand.signalement.net](https://www.legrand.com/signalement).

## CORRUPTION

*Corruption is a form of dishonesty undertaken by a person in a position of authority, often to acquire personal benefit.*

- Avoid any practice of offering, giving, receiving or soliciting, directly or indirectly, anything of value to influence the actions of another party.
- Accepting gifts, entertainment, and other business courtesies can create the appearance of a conflict of interest. Report all gifts, meals, travel and entertainment received from customers or competitors valued in excess of \$100 to your Controller so it can be recorded within the Compliance Register.
- Side jobs and certain activities outside of work may potentially conflict with your responsibilities to Legrand. Report any potential personal conflict of interest on the declaration form available from your HR administrator.
- To avoid misunderstandings, ensure business meals are reasonable and proportionate to the size of the business account.
- Document all discounts and rebates offered.
- Never indulge in payments that are or could be interpreted as bribes, even if they are customary in the country where business is being conducted.



# FRAUD

*An intentional act involving the use of deception to obtain an unjust or illegal advantage.*

- Avoid any act or omission or misrepresentation that knowingly misleads in order to obtain a financial or other benefit.
- Fraud and money laundering are strictly prohibited.
- Ensure all travel expenses are authorized. Ensure expenses are reasonable, directly related to company business, and supported by appropriate documentation.
- Never collude with external third parties attempting to illegally gain possession of Legrand's assets, either financial or intellectual property.



# EMBARGOES

*The United Nations Security Council, the U.S. government and the European Union impose financial and economic sanctions on certain individuals, companies and countries.*

- Avoid conducting business with entities in countries that are subject to financial and economic sanctions.
- Before conducting business with a customer in a new country, check if the country is on Legrand Group's embargo list.
- Make sure all customers and suppliers have been screened through World-Check One database.



# COMPETITION

*Any violation of competition law (antitrust), whether voluntary or involuntary, has the effect of altering or reducing competition in a given market and is prohibited.*

- Avoid agreements with competitors regarding pricing or markets.
- Avoid exchanging information with competitors.
- Avoid exclusive distributorship agreements, when possible.
- Avoid agreements with competitors to exclude other competitors from opportunities or to boycott suppliers or other third parties.

