

Glamox Group Modern Slavery Statement

Introduction

Glamox is committed to carrying out our business with integrity, and “Ethics” is one of our five core values. Slavery and human trafficking are cruel practices that unfortunately still exists in modern society. We all have a responsibility to be alert to the risks in our business and in the wider supply chain. As part of a global manufacturing industry, Glamox recognises that it has a responsibility to take a robust approach to slavery and human trafficking. With this statement we intend to provide details of the steps Glamox have taken as a business towards ensuring that we, including our supply chain, is not contributing to such conduct.

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 2019.

The Glamox Group is a leading developer, manufacturer and distributor of lighting solutions for the global market. We have operations in several European countries as well as Asia, the USA and Canada. The Group is headed by Glamox AS, a Norwegian limited liability company registered in Molde with its headquarter based in Oslo, Norway. We have divided the operations between three divisions; Professional Building Solutions, Global Marine and Offshore and Sourcing, Production and Logistics. We acquired Luxonic Lighting Ltd in May 2019, which expanded our UK business, previously conducted mainly through Glamox UK Ltd. We acquired the Polish major lighting group ES-System SA in December 2019. ES-System will be integrated with the Glamox group during 2020, and is therefore not made part of this statement.

Relevant Policies

We are committed to acting ethically and with integrity and transparency in all business dealings. We are continuously working with putting effective systems and controls in place to safeguard against unethical business conduct. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

Our Code of Conduct explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act. We launched our updated Code of Conduct in 2019, which includes our expectations to our employees and contributing third parties in a wide range of ethical issues, including compliance with laws and regulations, ethical behaviour in general and human rights and work safety.

We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated or concerns with practices within our business or supply chain, without fear of reprisals. Staff are expected to report concerns, and management are expected to act responsibly upon them in accordance with our internal procedures for this.

We provide equality and fairness for all in our employment, and do not tolerate discrimination on grounds of gender, marital status, civil partnership status, pregnancy, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or belief or age. We oppose all forms of unlawful and unfair discrimination. We expect all our managers to ensure that all employees are treated with dignity and respect and are 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.

We operate a Responsible Business Partner policy, which sets out our expectations to our third parties, including suppliers. It is a clear statement in this policy 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 behaviour that does not maintain human dignity and respect.

With a view to further strengthening our developments in the fields of HR, legal, ESG and risk management we established a new position in July 2019 as Group HR & Legal director. The position sits in the Group Management Team and is tasked with developing Glamox' group level policies and procedures in the abovementioned fields.

Our Suppliers

During 2019 we have strengthened the follow up of our suppliers by establishing a new Strategic Sourcing Department. The Strategic Sourcing Department is working with improving our supply chain management policies, including due diligence of suppliers on ESG matters, including modern slavery and human trafficking issues.

The new strengthened due diligence procedures is set to be implemented fully during 2020, and include completion of supplier approval questionnaire to include topics such as financial status, quality standards, environmental and sustainability, corporate social responsibility and supply chain controls. In addition to this, the Strategic Sourcing Department is working on improving our standard form of supplier contracts, ensuring to include appropriate clauses requiring all suppliers to conduct their business in accordance with laws and a certain ESG best practices standard.

Risk assessments & Training

The Strategic Sourcing Department is working on developing additional controls and procedures for continuous risk assessments of the existing and new suppliers, together with a plan for audits of suppliers on a risk based approach.

Our top management regularly communicates their commitment to ethical business conducts. In connection with implementation of our updated Code of Conduct and the Responsible Business Partner policy in beginning of 2019, all managers were tasked with implementing the policies in their respective business units, including training of all relevant employees.

Board approval

This statement was approved on 23 June 2020 by the board of Glamox AS, who will review and update it annually.

Date: 23 June 2020



Rune E. Marthinussen

CEO & President

Glamox AS