# HUMAN RIGHTS CHARTER





#LegrandImprovingLives



#### A word from Benoît Coquart, CEO

Legrand is the global specialist in electrical and digital building infrastructures. Its business is at the heart of social and environmental challenges, such as environmental protection, increasing life expectancy, rapid growth in data exchanges and, more generally, digitalisation - all major factors in the transformation of people's relationship with their environment. The company's purpose is to improve lives by transforming the spaces where people live, work and meet, with electrical and digital infrastructures and connected solutions that are simple, innovative and sustainable. Legrand is engaged with major global developments. This makes its social responsibility approach, which has been applied within its teams worldwide for many years, not only legitimate but natural.

Legrand is present in more than 90 countries around the world, employs more than 38,000 people in its staff and has tens of thousands of suppliers located in many countries. It is only natural, therefore, for it to pay close attention to compliance with ethics and human rights, not only at its own facilities, but also by ensuring that these principles are respected throughout its value chain.

These aims are in line with the UN Guiding Principles published in 2011, which provide a standard to prevent and address all discrepancies within the 'Protect, Respect and Remedy' framework. With this in mind, Legrand ensures that it applies not only national laws, but also international human rights standards, such as the Universal Declaration of Human Rights and the ten ILO Fundamental Conventions.

Legrand's teams act with conviction to improve lives. Respect for human beings and their dignity are at the heart of its corporate values. This is what Legrand aims to demonstrate with this Charter, which provides an overview of the principles that it intends to apply. Its international presence means that we have to deal with very different realities in the field, both in cultural and in social terms. This is one of the reasons why a global scope of action that respects individuals is essential.

Decent employment conditions, absence of discrimination, health and safety, freedom of association and refusal of child labour and forced labour are all essential areas in which Legrand chooses to act and communicate. It is also crucial for Legrand to guarantee respect for the human rights of communities affected by its activities and/or business relations, as well as those of its customers, consumers and users of its products and services. Therefore, it made sense to design a common reference framework for all employees and stakeholders worldwide.



**C**legrand<sup>®</sup>

## SUMMARY

SCOPE OF APPLICATION	4
AIMS AND SCOPE	5
PRECEDENCE AND CONFLICTS BETWEEN STANDARDS	5
Practices relating to human rights in the workplace	6
Child labour and young workers	7
Forced labour, slavery and human trafficking	
Health and safety	8
Freedom of association and collective bargaining	9
Non-discrimination	9
Decent employment conditions	10
Practices relating to the human rights of affected communities Practices relating to the human rights of business customers, consumers and end users	<u>12</u> <u>14</u>
Human rights practices	
in the value chain	16
REFERENCE DOCUMENTS HUMAN RIGHTS CONTROL	18
AND MONITORING SYSTEM	19
ALERT SYSTEM	20
GLOSSARY	22





#### **SCOPE OF APPLICATION**

This Charter applies to all subsidiaries controlled by Legrand.

With regard to its value chain\*, the company expects its direct suppliers and partners\* to adhere to the principles of its Supplier Code of Conduct.

\* Please refer to the glossary at the end of this document.



#### **AIMS AND SCOPE**

The principles set out in this Charter are intended to protect all internationally recognised human rights, as enshrined in the reference documents listed on page 18 of this Charter, of individuals affected or likely to be affected by the company's activities and/or business relations. This Charter covers the rights of:

- the company's salaried and non-salaried staff (including temporary and self-employed workers)\*;
- affected communities, including local communities;
- business customers (including their workers), consumers and end users of the company's services and products\*;
- and workers in the company's value chain (suppliers and partners).

Particular attention is paid to people who may be more exposed in terms of human rights, in particular women, children, young people, persons with disabilities, national, ethno-racial or religious minorities, LGBT+ people and migrant workers.

The company takes care to ensure that its projects take into account the consequences of its activities and/or relationships in order to mitigate any negative impacts and promote positive ones.

\* Please refer to the glossary at the end of this document.



#### **PRECEDENCE AND CONFLICTS BETWEEN STANDARDS**

The standards described in this Charter are the minimum threshold that Legrand is committed to respecting.

In the event of a conflict between local legislation and the standards set out below, the company, in accordance with its values, endeavours to apply the provisions that offer the greatest human rights protection, while respecting the limits imposed by local legislation.





PRACTICES RELATING TO HUMAN RIGHTS IN THE WORKPLACE

## Child labour and young workers\*

- The company ensures compliance with the legal working age set by local legislation and the absence of employment of children under the age of 15. In order to ensure this, the age of all recruited workers must be verified by an official identity document.
- The company ensures that it does not recruit staff under the age of 18 to perform work that is dangerous or liable to be detrimental to their health, safety or morality.
- Young workers do not work overtime.
- Until the age of 18, young workers are given an annual medical or paramedical examination in order to ensure that they are capable of performing the work for which they were hired.
- Apprenticeship contracts must not form the majority of a site's staff. These contracts are concluded as part of an educational programme and are limited in duration.
- If a young worker has chosen to continue their education, the company must organise their working time so that it does not overlap with school time.

## Forced labour, slavery and human trafficking

- The use of force or the threat of any penalty to oblige staff to do overtime is forbidden.
- The content of the function to be performed, working hours and times, the salary and the duration of the contract must be specified to candidates before they are recruited, by means of a contract or other document written in a language they understand and which must be jointly signed before the start of their activities.
- The pure and simple confiscation of any identity papers or travel documents, such as a passport or visa, is forbidden.
   In certain cases, the company may ask for original documents in order to register a worker with the relevant local authorities. In such a case, the documents required must be returned to the worker as soon as the procedure has been completed.
- On a regular basis, the company pays the remuneration due to its staff for the work performed.
- All staff members are free to leave the company premises at the end of the workday.
- All staff members are free to quit their job at any time, provided that the local legal notice period is respected.
- In accordance with local legislation, the end of the contract gives rise to the issuance of a work certificate or any other document that enables the employee to freely contract with another employer.



 Nevertheless, should child labour be observed, the company will take immediate measures to put an end to it, while seeking to place the child in question back in the country's educational system and to avoid exacerbating the economic situation of the family concerned.

\* Please refer to the glossary at the end of this document.



- Debt bondage is forbidden for all recruitments, whether they are made directly with the company or via a temporary employment agency or any other intermediary. This means that a staff member may not be considered to owe a debt, such as a guarantee or recruitment commission, to be reimbursed through unpaid labour.
- The company does not require its staff to make deposits with it to guarantee their employment or any other advantage, benefit or condition related to their employment.
- Human trafficking is prohibited. In other words, the company does not recruit, transport, transfer, harbour or receive people by means of coercion such as force, threat, abduction, fraud, deception, abuse of power or a position of vulnerability, for the purpose of exploiting them.
- The use of prison labour is possible in countries that are not considered to be a risk in terms of the respect of human rights, and provided that a contract is entered into with a trustworthy stakeholder that ensures compliance with applicable rules and the improvement of prisoners' living conditions and employability.
- Nevertheless, should a case of forced labour be observed, the company will take immediate measures to put an end to it and help the worker concerned to reintegrate into the labour market with their free consent.



## Health and safety

- · Health and safety rules applicable within the company can be consulted by all employees in a language that they understand.
- The company performs an assessment of the risks inherent to its activities, implements the actions necessary to control them and organises supervision of the health of its staff.
- · In accordance with national legislation and practice, employees and their representatives, if any, cooperate with the employer on matters of occupational health and safety.
- The company provides the necessary safety equipment to employees free of charge. Suitable protection is provided for employees who are required to use potentially dangerous techniques or substances. The company regularly trains its employees in safety instructions and prepares them to respond to potential emergency situations.
- The company ensures the safety of its manufacturing processes, machines and equipment as required by the ISO 45001 standard so that they present no danger.
- · Premises must provide safe and healthy conditions, and safety equipment must be present and in good working order.
- In order to reduce the risk of accidents, the company endeavours to identify near misses and deploy related prevention measures.

- Each accident is analysed in order to identify its root causes and implement corrective and preventive measures.
- Any accommodation provided for employees by the company must meet health and safety criteria.
- The company provides its staff with appropriate first aid means.
- The company recognises the right of its staff members to withdraw from a work situation which they have reasonable cause to believe presents a serious and imminent danger to their life or health. This right, exercised in good faith and in accordance with national conditions and practice, must not lead to undue consequences. Any such situation must be reported immediately by the person concerned to their direct manager or any other Management representative.
- The physical and mental health of its employees is a priority for Legrand. Through its Serenity On and Legrand Way programmes in Occupational Health & Safety, it requires the implementation of an approach to promote well-being and prevent psychosocial risks, including stress at work.

## Freedom of association and collective bargaining

- · The company considers that freedom of association and expression is based in particular on recognition of employee-elected representatives and their roles. The company recognises the legitimacy of their action within the company and ensures that all staff members are able to exercise their freedom of association rights in accordance with local legislation.
- · The company recognises the right of all employees to express their claims in particular via collective bargaining, in accordance with the principles set out in local legislation.
- · The company takes care to avoid discrimination against both employee representatives and staff on the basis of their membership of a trade union or their desire to form a trade union organisation.
- The company takes care to ensure that both employee and trade union representatives are protected against any measures that could be detrimental to them and that are motivated by their status or activities as representatives, provided that they act in accordance with the laws, collective bargaining agreements or other contractual arrangements in force.
- The company takes care to ensure regular and open social dialogue with its internal stakeholders (staff and social partners), in accordance with local legislation.
- · Essential topics such as working conditions, remuneration and conflict resolution are covered by regular dialogue with employee representatives, where present.
- · Where changes are liable to affect the headcount, the company takes care to ensure that the staff are informed within a reasonable period of time.
- · Employee representatives must be able to access the company's information, staff and premises, in accordance with their prerogatives and local legislation, in order to perform their representation activities.
- · The company condemns any situation involving harassment or discrimination of its staff, including the employee representatives and trade union representatives.
- · When the right to freedom of association and collective bargaining is restricted, the company endeavours to facilitate and not to obstruct the ability to freely and independently associate and negotiate, in accordance with applicable legislation.

## Non-discrimination



· The company endeavours to create an environment that guarantees equal opportunities for all.

 Any decision made by the company regarding recruitment, assignment, remuneration, promotion, training, discipline, retirement or termination of the employment relationship is based solely on objective factors, and is not related to sex, gender identity and expression, age, nationality, ethnicity, race, skin colour, religion or beliefs, caste, language, mental or physical disability, membership of an organisation, political opinion, state of health, marital status, family situation (including pregnancy), sexual orientation, birth, or the civic, social or political characteristics of the worker, place of residence, veteran/military status, or physical appearance.

· Decisions regarding recruitment, promotion and training are based on the job description, the professional profile, experience and skills of the individuals concerned.

· Within each subsidiary, the company endeavours to comply with the principle of equal pay for work of equal value, and is particularly vigilant with regard to potential discrepancies between men and women.

- Should discrimination be observed, the company will take corrective and disciplinary measures in accordance with the internal regulations or applicable local legislation, and will remedy the situation.

## Decent employment conditions

### **Combating violence and harassment**

- The company strongly condemns all work-related violence, whether this takes the form of cruel, degrading or inhuman treatment, assault, physical, psychological or sexual harassment, threats, intimidation or bullying, and whether it concerns the company's staff or third parties (customers, suppliers, site visitors or any other person in contact with Legrand staff in the course of the company's activities).
- If the company becomes aware that one of its staff members is a victim of violence, including outside of work, it will endeavour to listen to them and provide them with help and support. In addition to local arrangements with managers or HR teams, staff members can report situations, behaviours or risks likely to characterize a breach of the law or ethical rules through the Group's ethics and fraud alert system (see: system alert p. 20).
- In the event of behavioural misconduct, the disciplinary measures provided for by local legislation and the company's internal regulations must be applied.

### Organisation and working time

- The company must respect the working time stipulated by local legislation and, where applicable, collective bargaining agreements and local branch agreements.
- Overtime is paid at a higher rate.
- · Every staff member is granted at least one day of rest per week.
- Break times are provided during the working day.
- Staff members have access to the toilets whenever they need to, not just during break times.
- To facilitate a good work-life balance, work organisation methods such as remote working and flexible working hours can be arranged for positions and situations that allow it.



#### **Decent salary**

- The company pays a salary corresponding at least to the minimum wage set by local legislation (if one exists) and collective bargaining agreements, where applicable.
- The company endeavours to pay salaries that are sufficient to ensure a
  decent standard of living for its employees and their families, covering
  their basic needs such as food, housing, children's education, clothing,
  healthcare, communication, transport and any other essential needs,
  as well as a savings buffer to cope with unforeseen events, all based on
  a given local standard of living.
- Overtime should not be necessary to ensure a decent salary for the employees.

#### Job security, social protection and change management support

- Part-time working can be used for organisational reasons, at the request of employees or for medical reasons. Under no circumstances can it be a method enabling the company to avoid paying salaries and benefits on a full-time basis.
- The company grants paid leave, sick leave and parental leave in accordance with local legislation. Paid leave cannot be used as a substitute for sick leave.
- Complementing this approach, *the Serenity On* programme is an evolving system offering all employees a minimum level of social protection covering parenthood, health and welfare. The minimum duration of maternity leave is 14 weeks, in accordance with the International Labour Organization's Maternity Protection Convention, 2000, (No. 183).
- In the event of reorganisation and depending on the nature of the change, information or even prior consultation and collective negotiations with employee representatives may be carried out in accordance with local statutory regulations.
- When the company anticipates the consequences of the proposed change on the evolution of careers, working conditions (health, safety, quality of life at work) and even on employment levels, it involves, as far as possible and in compliance with local statutory regulations, the stakeholders concerned ahead of this change. It takes the best possible account of individual constraints, and takes care to ensure respect for individuals and fairness. It communicates on the purpose, issues and aims of the change. When necessary, it organises relevant training programmes to maintain employability and develop the skills needed for the rapid and effective implementation of changes.
- In the event of reorganisation with consequences for employment, the company endeavours to provide dignified support for outgoing employees by implementing the means best suited to each individual's situation and, if possible, adopting measures to aid a return to work, such as training, internal redeployment and support for finding work elsewhere.



## Protection of privacy and personal data

- The company collects and uses personal data in compliance with the regulatory framework and the rights of individuals, for specific, explicit and legitimate purposes and in a non-discriminatory manner.
- The company processes personal data that is accurate and, where necessary, kept up to date, adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- The company retains the data for no longer than is necessary for the purposes for which it is processed, and processes the data in such a way as to maintain appropriate security, in order to guarantee its integrity and confidentiality.
- Data subjects are informed of the processing of their personal data carried out by the company. They have full rights over their personal data as conferred by the regulations. In particular, they have a right of access to all personal data concerning them that is processed by the company.
- Personal information about an employee must be collected directly from said employee, unless he or she gives prior written consent for his or her personal information to be disclosed by a third party.
- In the event that the company uses measures to supervise and/or monitor its staff in the workplace, these measures must be reasonable, proportionate and justified with regard to the company's needs and obligations, and the data subjects must be duly informed.



# Use and development of artificial intelligence

- The company uses artificial intelligence within the strict framework of the applicable legislation, ensuring transparency and respect for fundamental rights.
- The company uses artificial intelligence as part of a sustainable and responsible strategy, taking into account its societal and environmental impacts, while ensuring the well-being of its staff.
- The company uses secure and reliable artificial intelligence systems that respect data privacy.
- The company is committed to promoting an inclusive approach and combating discriminatory biases in the development and use of artificial intelligence.
- Legrand is committed to ensuring that each artificial intelligence system respects the principles of transparency, traceability and explainability.
- To ensure compliance with these principles, the development and use of artificial intelligence is supervised by human beings.



## Economic and social rights

- The company endeavours to take into account the impact of its activities and/or its business relations on the communities affected or likely to be affected, so as to mitigate any negative impact and promote the economic and social development of these communities.
- The company respects the property rights of communities. It does not force them to relocate as part of new property development projects specific to the company and, in the event that relocation were to be envisaged, it would only be carried out subject to consultation and fair and prior compensation.

## Security and non-violence

- The company does not tolerate any act of mental or physical violence, nor cruel, inhuman or degrading treatment, or any other act of coercion intended to impede the exercise of these rights.
- Therefore, in the event that the company employs security guards to ensure the security of its premises, its staff and its property, it shall limit their role to preventive and defensive missions, and any use of force must be necessary, exerted within the legal framework and proportional to the degree of risk of the situation encountered.
- Within the framework of its regulatory obligations and/or its management system (ISO 14001 and ISO 45001), the company provides for emergency procedures and preventive measures with a sufficient level of protection according to the risks of occurrence of industrial accidents, taking into account the relevant interested parties.







# Freedom of expression and assembly

- The company respects the right to freedom of expression and assembly of communities and human rights defenders, in accordance with local legislation.
- Affected communities may lodge complaints via the company's alert system or any other channel they deem appropriate, in the event of potential negative impacts they may suffer as a result of its activities and/or business relations (see: alert system p. 20).



# Quality and use of products and services

- The company complies with the legislation and standards applicable to the production, manufacture, design and marketing of its products and services. The company takes care to ensure that its business practices are based on integrity and transparency.
- The company ensures that its products are safe for the health and safety of its business customers, consumers and end users for their intended and reasonably foreseeable use. The company is mindful of the use that could be made of its products and services by vulnerable individuals such as children, persons with reduced mobility and persons with disabilities, in order to guarantee their safety.
- The company endeavours to guarantee its business customers, consumers and end users access to high-quality and sufficient information about its products and services, so that they can make an informed choice and use them efficiently and safely.
- Legrand endeavours to ensure that the artificial intelligence used in its products and services contributes to the well-being of its business customers, consumers and end users. The company is committed to implementing artificial intelligence systems that are secure, reliable, transparent, traceable and non-discriminatory, while protecting data privacy and promoting a responsible and inclusive approach.
- The company condemns any improper, abusive, unauthorised or malicious use of its products and services.



THE HUMAN RIGHTS OF BUSINESS CUSTOMERS, CONSUMERS AND END USERS





## Non-discrimination

• The company takes care not to discriminate against people in its business practices (sales, communication, marketing) or in the use of its products and services.

# Privacy and freedom of expression

- The company guarantees its business customers, consumers and end users of its products and services the respect of their right to privacy and to the protection of their personal data.
- The company endeavours to respect the freedom of expression of consumers, end users and business customers. It guarantees that they will be listened to through surveys and customer services, as well as access to its ethics alert system (see: alert system p. 20).

For more information, the reader can refer to Legrand's Customer Experience Policy as well as its Quality, Occupational Health & Safety and Environment Policies.

15





## Sustainable procurement approach

- · Through its sustainable procurement approach, the company endeavours to promote a value chain that respects internationally recognised human rights, diversity, fairness and inclusion.
- The company ensures that its direct suppliers and partners comply with its Supplier Code of Conduct.
- · The company expects suppliers and partners to ensure that their practices comply with the principles set out in local, national and international laws, regulations and standards as cited in the Supplier Code of Conduct.
- The company expects suppliers and partners to commit to promoting and applying the same principles throughout their value chain with the same level of stringency.
- Through its risk analysis, the company verifies that all its strategic and privileged suppliers and partners implement an effective approach to the respect of human rights.
- The company exercises enhanced control over its suppliers and partners identified as potentially at risk.
- · For suppliers and partners assessed as high or critical risk, the company implements and follows mandatory formalised action plans.
- The company undertakes to source minerals only from responsible and reliable suppliers and prohibits purchases that would indirectly contribute to armed conflict or human rights abuses, as stipulated in its Conflict Minerals Policy.



The company ensures the traceability of minerals from its direct and indirect suppliers and partners, in compliance with regulations regarding minerals from conflict-affected or high-risk areas, and encourages them to apply the same principles to their own value chain, in accordance with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals.

- The company endeavours to establish a lasting, balanced and mutually beneficial relationship with its suppliers and partners within a clear framework.
- The company includes clear and binding contractual clauses in its business relationships with its suppliers and partners, to ensure that they respect human rights principles as described in its Supplier Code of Conduct.
- The company seeks fair contractual terms with its suppliers and partners, taking into account reasonable prices and deadlines for the supply of goods or services, so as to enable compliance with decent working practices and conditions for workers in the value chain.
- The company is committed to cooperation and continuous improvement. It is committed to supporting its suppliers and partners in achieving its high standards.
- Any failure or refusal to comply with these principles may have consequences for the business relationship, up to and including termination.



#### **REFERENCE DOCUMENTS, IN PARTICULAR:**

#### $\rightarrow$ International Bill of Human Rights (UN), including:

- Universal Declaration of Human Rights (1948)
- International Covenant on Civil and Political Rights (1966)
- International Covenant on Economic, Social and Cultural Rights (1966)

#### $\rightarrow$ Conventions of the International Labour Organization (ILO):

#### The ten fundamental conventions:

- The Forced Labour Convention, 1930 (No. 29)
- The Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
- The Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
- The Equal Remuneration Convention, 1951 (No. 100)
- The Abolition of Forced Labour Convention, 1957 (No. 105)
- The Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- The Minimum Age Convention, 1973 (No. 138)
- The Occupational Safety and Health Convention, 1981 (No. 155)
- The Worst Forms of Child Labour Convention, 1999 (No. 182)
- The Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187)

The Workers' Representatives Convention, 1971 (No. 135)

#### → Human Rights Principles and Labour Standards of the Global Compact

- → UN (United Nations) Guiding Principles on Business and Human Rights, known as the 'John Ruggie Framework', advocating a three-step approach: protect, respect, remedy
- $\rightarrow$  UN Sustainable Development Goals (SDGs)
- $\rightarrow$  Organisation for Economic Co-operation and Development (OECD) **Guidelines for Multinational Enterprises**
- $\rightarrow$  Convention on the Rights of the Child (UN), 1989

#### HUMAN RIGHTS CONTROL AND MONITORING SYSTEM

#### Due diligence approach

#### Mapping:

Legrand maps its human rights risks in order to target its actions, in its controlled subsidiaries, its downstream value chain, and with its direct suppliers in its value chain.

#### **Assessing:**

Based on its risk mapping, the company carries out regular assessments of respect for human rights in its controlled subsidiaries. To ensure the effective implementation of the Human rights Charter, a self-assessment grid is sent to each Legrand subsidiary for its internal practices. Each HR department responsible for its implementation then completes the tool and sends it to the company's HR Social Issues Manager.

It also carries out regular assessments of its direct suppliers' respect for human rights in its value chain, in particular through its risk analysis, its CSR risk assessment platform and on-site audits.

For any new project (acquisitions, mergers, joint ventures), the company carries out assessments (due diligence), covering in particular issues relating to respect for human rights, and takes the results into account in its decision on whether to go ahead with the project in question.

#### Taking action to mitigate or prevent:

The company's commitment is to remedy any discrepancies that may be detected at its controlled subsidiaries, and to use its influence to do the same with its suppliers and its value chain. If a discrepancy is detected, action plans are put in place to remedy the situation.

#### Alertina:

The alert system is detailed and publicly accessible, particularly on the legrandgroup.com website (see: alert system p. 20).

#### Monitoring and assessing the effectiveness of measures:

The measures implemented and their effectiveness are monitored on a regular basis.

As part of this approach, the company recognises the importance of meaningful dialogue with its stakeholders, whether internal or external, such as its suppliers and partners in the value chain, its business customers, the consumers and end users of its services and products, the affected communities and their legitimate representatives, human rights defenders and civil society and its representatives (NGOs, associations).

For more information on Legrand's due diligence approach and key human rights issues, readers may refer to its due diligence plan and sustainability report, which are included in its annual Universal Registration Document.





#### Governance

Respect for human rights is an integral part of Legrand's values. Accordingly, a dedicated governance structure has been set up within the company.

The HR Social Issues Manager, a human rights expert reporting hierarchically to the Executive VP Human Resources, is responsible for the proper application of this Charter with regard to the company's internal activities.

The Purchasing Department is responsible for managing the human rights policy with regard to the value chain.



#### **ALERT SYSTEM**

#### Ethics and fraud alert

Legrand has introduced a system that allows anyone (employees and other stakeholders, e.g. customers, suppliers, consultants, representatives of affected communities, consumers and end users, etc.) to alert the Group to:

- a crime or offence;
- a breach or an attempt to conceal a breach of the law or regulations, international law or European Union law;
- a threat or harm to general interest;
- the existence of conduct or situations contrary in particular to the Shared Code of Ethics, the Guide to Best Business Practices or the Human Rights Charter, of which the whistleblower is personally aware.

Depending on the subject of concern, these alerts can be escalated to the Group Compliance Officer, the Executive VP Human Resources, the Human Resources Compliance Officer and the Head of Internal Audit via the Legrand Group reporting portal: legrand.signalement.net (Signal'Ethic).

In addition to Signal'Ethic and depending on the nature of the alert, employees and stakeholders can also contact:

- · management, who can guide and advise employees (except when they themselves are the subject of the alert, in which case the whistleblower can choose one of the alternatives presented in this procedure);
- the Human Resources Department;
- the Group Compliance Officers;
- the Group Internal Audit Department;
- the Group Finance Control Department.

#### **Protection for whistleblowers**

Legrand provides protection against retaliation for whistleblowers. This means that no one may suffer reprisals, or threats of reprisals, because they have reported an ethics or fraud issue in good faith.

#### Strict confidentiality is maintained

Information collected by all recipients of the report and the people concerned remain strictly confidential.

- · Compliance with embargoes, international sanctions and prevention of money laundering;
- Combating fraud.

### Respect for human rights in the workplace:

- · Combating discrimination and harassment in the workplace;

#### Failure to comply with applicable laws and regulations, as well as threats to or detriment to the general interest.

privilege.

## Remediation

In addition to the provisions described in the preceding paragraphs, if, following an admissible alert, the internal investigation confirms a non-compliance with the commitments described in this Charter, the company shall take the necessary steps to remedy the situation, within the framework of the applicable legislation.

### Areas covered by the ethics alert

Reports must relate to the following areas:

- Compliance in business relations with our stakeholders:
- Compliance with competition rules;
- Combating corruption and influence peddling;
- Combating child labour;
- · Combating forced labour;
- Guarantee of freedom of association;
- Respect for decent working conditions;
- · Guarantee of health and safety at work.

#### Serious environmental damage:

For example, emissions or pollution of soil, air and water, illegal dumping of waste, etc....

In contrast, alerts may not concern elements which are covered by national defence secrecy, medical confidentiality, the confidentiality of judicial deliberations, the confidentiality of judicial inquiries or investigations, or lawyer-client

## **GLOSSARY**

#### **Business customers**

This includes project managers, electrical equipment distributors, specifiers, project owners and professional end-users.

#### Child

Refers to any person under the age of 18 unless the age of majority is reached earlier under the legislation applicable to the person.

#### Consumers and end users

This includes private consumers of products sold by Legrand.

#### Staff

In this Charter, this term refers to the definition given by the CSRD (Corporate Sustainability Reporting Directive - EU). This definition includes "both persons who have an employment relationship with the company ("employees"), and persons who are not employees, but are either persons with a contract with the company to supply labour ("self-employed workers"), or persons supplied by companies that are principally engaged in "work activities" (NACE code N78)".

#### Value chain

In this Charter, this term refers both to the upstream value chain, including the various subcontractors, suppliers or providers from whom Legrand purchases, and to the downstream value chain, involving the transport and storage companies that provide services to Legrand.

#### Value chain partners

This includes any legal or natural persons in the value chain as defined above.

#### Young person

Refers to any person who has reached the legal age to leave school and enter the job market (at least 15 years old) but who has not yet reached the age of 18.







## Human Rights Charter

Head Office 128 av De Lattre de Tassigny 87045 Limoges cedex – France Tel : +33(0)5 55 06 87 87 legrandgroup.com

