

LEVITON CODE OF CONDUCT

To Our Employees, Customers, Vendors, and Business Community:

Leviton Manufacturing Co., Inc., and its affiliates worldwide (“Leviton”), are committed to ethical business practices, as reflected in our [Mission Statement](#). This means dealing honestly, respectfully, and mindful of our obligations to our employees, our customers, our suppliers, and to the environment. At a minimum, it mandates compliance with the law, but in practice it means doing what is right.

1. COMPLIANCE WITH THE LAW AND THIS CODE

We are all responsible to respect and obey the laws and rules of the municipalities, states and countries in which we operate and the industry organizations relevant to our business. Although we may not be experts in the details of each applicable law, it is incumbent on us to be familiar with those that concern our daily work-related activities and to seek guidance in those areas where we are less familiar.

Employees, who become aware of, or have good reason to suspect a violation or potential violation of this Code should bring it to the attention of their supervisor or manager, the Human Resources department of their facility or anonymously through the Leviton Hotline, ReportIt.

2. BRIBERY AND CORRUPTION

We do not tolerate, permit or engage in bribery, corruption or any illegal payments including any violation of the US Foreign Corrupt Practices Act, the UK Bribery Act, or other anti-bribery laws that govern where we do business. Compliance with anti-bribery laws is a condition of employment or association with Leviton.

3. CONFLICTS OF INTEREST

No one should engage in a transaction where their interest conflicts with that of the company. A “conflict of interest” exists when a person’s private interest interferes or appears to interfere in any way with the interests of Leviton. It can arise when an employee takes action or has interests that may make it difficult to perform their work objectively and effectively, or when they or members of their family receive improper personal benefits as a result of their position at Leviton. For example, it is almost always a conflict of interest for an employee to work simultaneously for a competitor, customer or supplier. Care must also be taken, and supervisor guidance and approval received, in writing, when doing business with a close relative.

4. PRODUCT QUALITY AND SAFETY

A safe working environment and the well-being of our employees and customers is always at the forefront of our thinking. We produce code compliant products that meet or exceed standards to ensure the safety of the installers and end users. We continuously strive to educate and promote good practices at our factories, and to the consumer and trade. We set high standards, track key metrics, and utilize defined Quality Management Systems. This commitment requires the support of every individual throughout the organization focused on continuous improvement in our people, processes, and systems.

5. LABOR & HUMAN RIGHTS

Worker Safety and Health

Leviton is committed to providing a safe work environment for its employees, where precautionary measures are taken against accidents and occupational hazards. Training and ongoing health and safety education are provided to employees, and procedures are implemented to minimize harm to life, environment, and property.

Child Labor

Leviton does not employ workers younger than the applicable minimum legal age and will not tolerate unlawful child labor in its supply chain.

Human Trafficking and Forced Labor

Leviton does not tolerate or engage in any form of human trafficking, slavery, or labor that is forced, bonded, involuntary, indentured, or imprisoned.

Working Hours and Remuneration

Leviton complies with all applicable laws with respect to working hours, days of rest, overtime, and legally mandated minimum wages and benefits. It does not apply disciplinary or other forms of deductions from pay or apply any forms of discrimination in remuneration practices, except when mandated by law.

Anti-Discrimination and Equal Opportunity

Leviton is dedicated to treating its employees, customers, suppliers, distributors, competitors, and communities that it serves with respect and fairness. Leviton embraces diversity in the workplace and is an equal opportunity employer.

Anti-Harassment and Abuse

Leviton is committed to providing and fostering a work environment that holds our employees' dignity, respect and human rights in high regard. To that end, Leviton does not tolerate harsh or inhumane treatment of employees in the workplace, including verbal or physical abuse, psychological or sexual harassment.

Conflict Minerals

Leviton commits considerable resources to ensure that the products and components in our supply chain are responsibly sourced. We expect our Suppliers to exercise reasonable efforts and due care to provide a conflict minerals report concerning whether the materials, parts and products supplied to Leviton contain columbite-tantalum (coltan), gold, wolframite, tin, tungsten, and any other minerals the U.S. Secretary of State designates as so-called "conflict minerals" originating from the Democratic Republic of Congo and adjoining countries. Leviton may reconsider its willingness to partner with a supplier that does not provide a conflict minerals report.

6. FRAUD AND TAX COMPLIANCE

Leviton complies with its tax obligations and expects the businesses and people with whom we engage with to comply with their respective obligations. We will not engage in transactions which we know or suspect facilitates tax evasion, even if not engaging in such transactions may result in Leviton losing business.

7. ENVIRONMENTAL RESPONSIBILITY

Leviton operates its facilities in an environmentally responsible manner that are in accordance with or exceed applicable statutory and international law and standards. Where possible, Leviton uses sustainable energy solutions in its manufacturing and distribution processes, producing environmentally and consumer-friendly products. Moreover, Leviton strives to create a more sustainable world via our employees, eco-friendly product design, procedures, and best practices. [Leviton is committed to sustainability](#), manufacturing products, and providing training and education on sustainable solutions that help businesses reduce their energy consumption, save on costs, and decrease their carbon footprints.

8. FAIR DEALING

Leviton strives to be a market leader by delivering the best product and customer support through honest competition. Leviton expects its employees to deal fairly with its customers, suppliers, and competitors, complying at all times with applicable antitrust and competition laws.

9. CONFIDENTIALITY AND DATA PRIVACY

Leviton is committed to the use of reasonable best practices to protect data and comply with applicable data protection and privacy laws, including US and European regulations.

Confidential and Proprietary Information

To safeguard the confidential and proprietary information of Leviton, in addition to third party information provided to us, it is imperative that all employees protect and prevent unauthorized access to or disclosure of such information; for example, information relating to Leviton's business, finances, IT infrastructure, employees, or Business Partners. Employees should exercise care when sending and storing information, refrain from providing any Leviton or third-party confidential information without an approved Non-Disclosure Agreement (NDA), beware of electronic phishing requests and other e-scams, and avoid discussing confidential information where you can be overheard.

Personal Information and Privacy Laws

Personal information identifies a person, such as a name, address, email, and the like. Leviton is responsible for protecting personal information within the boundaries of applicable data protection and privacy laws and its Privacy Policy. To that end, the company has implemented technology and security policies and procedures to safeguard the data that is under Leviton's control from unauthorized access, improper use, alteration, unlawful or accidental destruction, and accidental loss.

10. PROTECTION OF COMPANY ASSETS

Employees are often in a position of trust concerning personal information and property of one's co-workers, Leviton or a third party. Employees should always conduct themselves with the highest levels of propriety and integrity. Leviton equipment should not be used for non-company business, though occasional or incidental personal use may be permitted. Any suspected incidence of fraud or theft should be immediately reported to a supervisor, HR manager, or through the Leviton ReportIt Hotline.

11. REPORTING AND NO RETALIATION

It is our hope that you do not find yourself in a position necessitating the reporting of misconduct. However, should that occur, please report your suspicions. Do not assume management is aware of your concerns. If possible, submit your report to your supervisor or manager. If this is not practical or uncomfortable, we recommend reporting your concerns to an HR manager, or through the **Leviton ReportIt Hotline**. The Hotline can be used to file a report, anonymously online at www.reportit.net (user name: Leviton, password: hotline), or by telephone at 1-877-RPT-LINE. ReportIt is available 24/7/365. All concerns submitted via this independent, third party hotline will be initially reviewed and investigated by Leviton's General Counsel or a designee.

Leviton is committed to timely identification and resolution of issues that may adversely affect employees or the Company. Therefore, Management is committed to ensure that persons reporting misconduct in good faith will not suffer retaliation.

This Code was adopted by the Board of Directors of Leviton Manufacturing Co., on March 4, 2019, and may be amended from time to time as the Board deems appropriate.